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GRASS CREEK

GRAZ- ING FINAL ENVIRONMENTAL IMPACT STATEMENT

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U. S. DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT
WORLAND DISTRICT, WYOMING
1982



10-88013508



IN REPLY
REFER TO:

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Enclosed for your information is the Final Grass Creek Grazing Environmental Impact Statement (FEIS). It has been printed in an abbreviated format consistent with the Council on Environmental Quality regulations, and should be used in conjunction with the Grass Creek Draft EIS (DEIS).

No decisions will be made until 30 days after the FEIS Notice of Availability has been published in the Federal Register. All comments on the DEIS and FEIS will be considered in the decisionmaking process. All of the comments dealing with the usable vegetation production data will be resolved through application of the BLM grazing management policy and the grazing regulations. This policy emphasizes the use of monitoring as a systematic way to determine where and what kind of problems exist and to devise ways to correct them. This approach is exactly what we are proposing in the Grass Creek EIS proposed action.

Absolute accuracy with respect to long-term stocking rates is impossible to achieve with any inventory process because of the number of variables involved. Furthermore, for EIS analysis purposes, it is not significantly relevant. The value of the usable vegetation production data is for impact comparison purposes rather than for establishment of absolute numbers.

We extend our thanks to those individuals and organizations who provided suggestions and comments throughout the EIS process. Your help has been invaluable in the preparation of these documents which will assist us to more effectively manage the public lands. Properly managed livestock grazing has been and will continue to be an important factor in improving the condition of most of the rangelands in Wyoming and the West.

Sincerely yours,

Maxwell T. Lieurance
Maxwell T. Lieurance
State Director

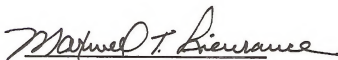
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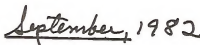
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DEPARTMENT OF THE INTERIOR
FINAL
ENVIRONMENTAL IMPACT STATEMENT
GRASS CREEK GRAZING MANAGEMENT PROGRAM

Prepared by
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT



State Director, Wyoming State Office



Date

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SUMMARY

The Grass Creek Grazing Environmental Impact Statement (EIS) analyzes the effects of proposed and alternative livestock grazing management on approximately 965,000 acres of public land administered by the Bureau of Land Management (BLM), Worland District, in Wyoming. This document will be used to determine future grazing management, based on the principles of multiple use and sustained yield. Refer to the Glossary for definitions and explanation of technical terminology.

AREAS OF CONTROVERSY

Prior to preparation of the EIS, a "scoping" process was conducted to identify significant issues. Based on contacts with federal, state, and local agencies; organizations; and individuals, the following list of issues was developed:

1. Providing adequate forage for livestock and wildlife;
2. Possible livestock reductions on some allotments;
3. Change in season of use on some allotments (particularly from spring use to other seasons);
4. Effects of livestock grazing on soil, watershed, vegetation, wildlife, recreation, cultural, visual, and wilderness resources;
5. Economic consequences of various management actions;
6. Providing for an equitable balance between livestock grazing and other uses on the public land, while minimizing governmental influences on traditional activities.
7. Use of the forage allocation model to establish usable vegetation levels.

PROPOSED ACTION AND ALTERNATIVES

Proposed Action

It is proposed that BLM continue the existing management of livestock grazing present in the Grass Creek Resource Area (GCRA) while monitoring that use to determine if management objectives are being met. Management objectives are to maintain present range condition on 60 allotments

(164,000 acres); improve range condition on 53 allotments (615,000 acres); and prevent deterioration on 49 allotments (172,000 acres). There is some public land in the GCRA that is not in an allotment or licensed for grazing (14,000 acres).

The proposed action is based on multiple-use recommendations developed during the land use planning process now being completed for Grass Creek. Actions in the proposal include: (1) inventory and monitoring, (2) adjustments in consumptive grazing use, (3) changing seasons of use, and (4) constructing additional grazing management facilities and conducting land treatments on selected areas.

The total usable vegetation estimates are used for analytic purposes and to establish livestock, wildlife, and wild horse use levels in the "Manage for Other Grazing Uses" alternative. These data will not be used to establish initial stocking levels in the proposed action; adjustments in these levels, if any, would be made on the basis of monitoring data.

Alternative 1 (No Change)

The current livestock grazing management would be continued. Grazing systems on existing allotments would remain. Present livestock management facilities would be maintained at the present rate but new facilities would not be installed. Grazing permits would be issued at present levels of grazing preference (108,000 AUMs). No specific forage allocation would be made for wildlife or wild horses.

Alternative 2 (No Action - No Livestock Grazing)

All authorized grazing on federal lands would be eliminated as permits expire (approximately 1989) except trailing use. Only those range improvements that benefit other uses would be maintained. No new improvements for livestock grazing would be installed.

Alternative 3 (Optimize Livestock Grazing)

All available forage would be allocated to livestock on a sustained yield basis. All wild horses

would be removed. All range improvements and plant treatments that would benefit livestock grazing would be implemented except as constrained by land use plan recommendations other than those intended to protect wildlife.

Alternative 4 (Manage for Other Grazing Uses)

Other grazing uses would be given preference over livestock grazing. Wild horse numbers would be limited to land use plan recommended numbers. Conflicts between livestock and other grazing use would be eliminated by restricting or excluding livestock.

LONG-TERM ENVIRONMENTAL CONSEQUENCES

Vegetation

The proposed action would result in improved range condition on approximately 600,000 acres and Alternatives 2, 3 and 4 would improve condition on approximately 965,000 acres. Alternative 1 would cause little change from the present situation. The proposed action and all alternatives except Alternative 1 would result in an increase of forage production.

Soils

Alternatives 1 and 3 would cause little change in the acreage of decreased soil productivity. All other alternatives and the proposed action would result in an improvement over the present situation.

Soil erosion would be greatest with Alternative 1. The proposed action and Alternative 3 would result in intermediate levels of soil erosion, and Alternatives 2 and 4 would cause the least soil erosion.

Water

Surface water runoff would change only slightly from the present with Alternative 1. The proposed action and Alternatives 2 and 4 would decrease runoff by about 6-8 percent and Alternative 3 by about 10 percent. Sediment yield would be affected similarly to soil erosion.

Wetlands

The proposed action and Alternatives 2 and 4 would effect a long-term improvement trend in stream and reservoir wetland habitat. Alternatives 1 and 3 would generally cause a continued decline in habitat conditions except for a slight improvement in reservoir habitat in Alternative 3.

Wildlife

The proposed action would increase big game carrying capacity but this would not be enough to reach Wyoming Game and Fish Department (G&F) goals. Alternative 2 would result in wildlife carrying capacity far in excess of G&F goals and Alternative 4 would allow the goals to be reached. Alternative 1 would result in the least forage available for wildlife.

Recreation and Visual Resources

The proposed action and Alternatives 2 and 4 would slightly increase hunting opportunities and visual quality. Alternatives 1 and 3 would result in a slight decrease in hunting opportunities.

Livestock Grazing

The proposed action would improve livestock conditions (weaning weights, calf crops, etc.) in allotments that would be managed with range improvement as an objective. Alternative 1 would cause little change. Alternative 2 would result in a reduction in livestock grazing of at least 81,300 AUMs and landowners would have to fence an undetermined amount of private and state land to avoid livestock trespass on public land. Alternative 3 would require increased management control and livestock production would be slightly increased. Alternative 4 would result in reduced livestock numbers in most allotments but livestock condition would be improved.

Economics

The proposed action would reduce personal income in the livestock sector. The total impact, which includes the secondary impacts of the income reduction in the livestock sector, would

amount to \$200,000 for the Big Horn Basin. However, this could be partially offset by increases in income related to increased recreation expenditures. Alternative 1 would cause no change; Alternative 2 would cause a decrease of \$1.2 million; Alternative 3 would increase personal income by \$390,000 and Alternative 4 would decrease personal income by \$100,000. None of the alternatives is expected to cause more than half a percentage change in total employment in the Basin.

CONCLUSIONS

The No Livestock Grazing Alternative (2) and Manage for Other Uses alternatives (4) would provide major benefits to most natural resources; however, they would cause a decrease in total income and disrupt traditional grazing operations on public land.

The No Change alternative (1) would allow deterioration of natural resource values in some allotments. The Optimize Livestock Use alternative (3)

would allow for an overall increase in livestock use but would cause reductions in other grazing uses.

The proposed action allows for overall improvement for many natural resources on a majority of the Grass Creek Resource Area while causing least relative disruption to the livestock industry and historical grazing uses. It also complies with federal regulations and is consistent with local plans and policies. It represents a reasonable balance of resource utilization and has been selected as the "preferred" alternative in the Grass Creek Grazing EIS.

Table S-1 is a comparative summary of projected long-term impacts.

TABLE S1
COMPARATIVE SUMMARY OF PROJECTED LONG-TERM IMPACTS (20 YEARS)

Resource	Existing Situation	Proposed Action	Alternative			
			1	2	3	4
			No Change	No Livestock Grazing	Optimize Livestock Grazing	Manage for Other Grazing Uses
<u>Vegetation</u>						
Ecological Condition (1,000 Acres)						
Good/Excellent	333	711	298	836	737	812
Fair	503	229	510	128	215	170
Poor	166	62	194	38	50	20
Forage Production (Million Lbs.)	72	92	68	106	103	98
<u>Soils</u>						
Sediment Yield (Ac.Ft. per year from approx. 1 million acres)	1,750	970	2,350	550	880	640
<u>Water</u>						
Surface Runoff (1,000 Ac.Ft. per year from approx. 1 million acres)	20.0	18.7	20.1	18.3	17.7	18.4
<u>Wetlands</u>						
% Change in Habitat Condition from Present	0	+75	-25	+200	-5	+250
<u>Wildlife</u>						
% Change from Present in Carrying Capacity for Big Game	0	+5	-17	>+67	-4	+17
<u>Recreation</u>						
Recreation Opportunities	N/A	Slight Increase	No Change	Slight Increase	Slight Decrease	Slight Increase
<u>Livestock Grazing</u>						
Change from Existing Management Situation	N/A	Some change on 37% of allotments	No Change	Change on all allotments	Change on all allotments	Change on all allotments
Level of Livestock Forage Use (AUMs)	127,400	110,300	127,400	46,100	146,000	118,000
<u>Economics</u>						
Change in Ranch Valuation (Millions of dollars)	N/A	- 3.6	0	- 7.4	-1.4	- 3.1
Total Changes in the Big Horn Basin's Personal Income resulting from the Direct Change in the Livestock Sector (Thousands of dollars)	N/A	-200	0	-1230	+390	-100

TEXT REVISIONS

PAGE

S-1 Areas of Controversy

Add: 7. Use of the forage allocation model to establish usable vegetation levels.

S-1 Paragraph 1

Add: "The 'total usable vegetation' estimates are used for analytic purposes and to establish livestock, wildlife, and wild horse use levels in the Manage for Other Grazing Uses alternative. These data are not used to establish initial stocking levels in the proposed action; adjustments in these levels, if any, would be made on the basis of monitoring data."

S-2 Livestock Grazing

Change: "Alternative 2 would result in an estimated average 20 percent reduction in livestock numbers." to: "Alternative 2 would result in a reduction in livestock grazing of at least 81,300 AUMs. Landowners would have to fence an undetermined amount of private and state land to avoid livestock trespass on public land."

S-5 Table S1 Livestock Grazing

Delete: Change in Demand for Livestock Forage, and replace with: Level of Livestock Forage Use (AUMs) 127,400 Existing Situation, 110,300 Proposed Action, 127,400 Alternative 1, 46,100 Alternative 2, 146,000 Alternative 3, and 118,000 Alternative 4. Note that the 46,100 AUMs of Alternative 2 are AUMs on private and state land in allotments where BLM authorizes livestock grazing.

6 Figure 1-2

Allotment 0623 should be in C₁ category.

14 Item 3e

Add: —or selective hand spraying.

15 Item 4

Should read: On big game crucial ranges:

16 Paragraph 3

Add: It should be noted that the category in which an allotment falls would change as the situation in the allotment changes. For example, if conflicts are resolved in an allotment it could be reclassified from "I" category to "M" category. Similarly, if conflicts develop in an "M" allotment it could be reclassified "I".

22 Table 1-3

Change Allotment 0558 from Basin to Buck Creek. Add Allotments 0568 Basin and 0621 North Grass Creek.

27 Table 1-4

Add prescribed burn for allotments 0633 and 0634.

33 Table 1-7

See revised Table 1-7.

36 Tables 1-9 and 1-10

See revised Tables 1-9 and 1-10.

38 Environmental Protection Agency

Replace last two sentences with: "In Wyoming, EPA, by authorizing 208 grants to the Wyoming Department of Environmental Quality, has delegated management responsibility for non-point source pollution to the state, which, within the framework of the statewide 208 Plan has delegated its authority to those regions accepting areawide planning and management responsibilities. The areawide planning or management agency in turn works with the respective land management agencies or conservation districts."

42 Table 1-12

See revised Table 1-12.

47 Table 1-14

See revised Table 1-14.

TABLE 1-7

FORAGE DEMAND FOR THE PROPOSED ACTION
(1,000 Pounds of Forage)

<u>Category</u>		<u>Demand</u>
"M"		
	Livestock	38,586
	Wildlife	6,593
	Wild Horses	216
	Total	45,395 <u>1/</u>
"I"		
	Livestock	80,535
	Wildlife	8,337
	Wild Horses	864
	Total	89,736 <u>2/</u>
"C ₁ "		
	Livestock	12,309
	Wildlife	1,571
	Wild Horses	-
	Total	13,880
"C ₂ "		
	Livestock	935
	Wildlife	226
	Wild Horses	-
	Total	1,161
All		
	Livestock	132,365
	Wildlife	16,727
	Wild Horses	1,080
	Grand Total	150,172

1/ For the purpose of analysis of the proposed action it is assumed that supply is equal to demand in all "M" and "C" category allotments.

2/ Supply for this category is 43,741 (1,000 lbs.) based on preliminary forage production data.

TABLE 1-9

FORAGE DEMAND FOR ALTERNATIVE 1
(1,000 Pounds of Forage)

	<u>Demand</u>	<u>Supply</u> <u>1/</u>
Livestock	132,365	
Wildlife	14,299	
Wild Horses	<u>1,080</u>	
Total	147,744	72,441

1/ Based on preliminary forage production data.

TABLE 1-10

FORAGE SUPPLY AND DEMAND FOR ALTERNATIVE 2
(1,000 Pounds of Forage)

	<u>Demand</u>	<u>Supply</u> <u>1/</u>
Livestock	0	
Wildlife	16,727	
Wild Horses	<u>1,080</u>	
Total	17,807	72,441

1/ Based on preliminary forage production data.

TABLE 1-12

FORAGE SUPPLY AND DEMAND FOR ALTERNATIVE 3
(1,000 Pounds of Forage)

	<u>Demand</u>	<u>Supply</u> <u>1/</u>
Livestock	132,365	
Wildlife	16,727	
Wild Horses	<u>0</u>	
Total	149,092	72,441

1/ Based on preliminary forage production data.

TABLE 1-14

FORAGE SUPPLY AND DEMAND FOR ALTERNATIVE 4
(1,000 Pounds of Forage)

	<u>Demand</u>	<u>Supply</u> <u>1/</u>
Livestock	59,696	
Wildlife	16,727	
Wild Horses	<u>1,080</u>	
Total	77,503	72,441

1/ Based on preliminary forage production data

PAGE

56 Wyoming Department of Game and Fish
(G&F)

Should read: The G&F has established goals and objectives for fish and wildlife management on public lands within the GCRA. Because fish and wildlife habitat would be affected by the proposed grazing management (especially the stocking rates), there has been coordination between BLM and G&F in developing the proposed action. Specifically, the G&F has cooperated with BLM in determining existing big game numbers and projecting 1990 desirable herd sizes for the GCRA. Continuing joint studies are being conducted on big game winter ranges and migration routes, as well as sage grouse strutting grounds. Attainment of G&F general goals and objectives for fish in the Bighorn Basin entails aquatic habitat restoration and improvement on public land in the GCRA. The G&F would also review all proposals for land treatment and cooperate in Sikes Act projects.

58 Productivity

Second paragraph, first sentence should read: The present total yearly vegetative production (including trees, shrubs, annuals) for the inventoried area is 625 million pounds, of which 72 million is considered forage production available for proper use by livestock, wildlife, and wild horses during their historical seasons of use.

58 Soils

Paragraph 3, line 5, replace sentence 3 with the following: Their soils are shallow to deep and typically not well drained because of high clay contents and concentrations of salts and gypsum in many profiles.

61 Surface Water

Last paragraph, second sentence should read: "Sampling by USGS during 1977" found that the State of Wyoming standard of 1,000 fecal coliform—100 ml for Class II streams was exceeded frequently.

63 Wildlife

First sentence should read: The following discussion focuses on threatened and endangered species, economically important species, and animals or groups of animals that we expect would be significantly affected by the proposed action and alternatives.

PAGE

63 Pronghorn Antelope

First sentence should read: The estimated post-hunting season antelope population in 1980 was about 3,700 animals, while the Wyoming Game and Fish Department goal for the portions of the herd unit encompassing the Grass Creek EIS area is a 4,500 post-season population.

64 Deer

First two sentences should read: Mule deer with an estimated winter population of 6,200 and a summer population of 7,400 animals, are the most common big game animal. The Wyoming Game and Fish Department goal, for the portion of the herd units in the Grass Creek EIS Area is 9,700 animals in the winter and 8,600 in the summer.

64 Black-Footed Ferret

Add the following sentences: In 1982, a dead ferret was found in the area and evidence of ferrets in two other locations has been reported but not verified. These sites will be investigated.

64 Threatened or Endangered Species:

Add the following subsection: Peregrine Falcon

The Grass Creek Resource Area includes some historical peregrine falcon habitat. However, there is no documented evidence of their presence here within the past 30 years.

66 Table 2-2

Annual Recreation Days for Resident Fishing should be: 1,200.

67 Figure 2-10

See revised Figure 2-10.

68 Livestock Grazing

Second paragraph, fourth sentence should read: Both cow—calf and yearling cattle operators are present in the area and sheep operators use both shed and range lambing practices.

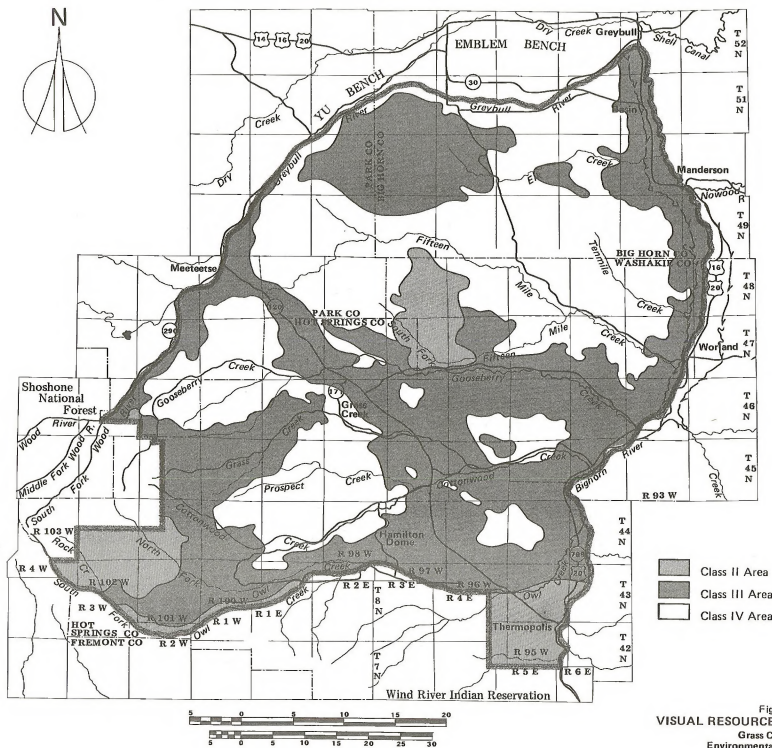


Figure 2-10
VISUAL RESOURCE MANAGEMENT AREAS
 Grass Creek Grazing
 Environmental Impact Statement

PAGE**69 Local Income and Employment**

Fourth paragraph, second and third sentence should read: About 60 full-time equivalent (FTE) jobs are directly associated with livestock grazing on allotments where BLM authorizes livestock use. This number does not include those FTE jobs associated with crop or livestock production on private lands where BLM does not license livestock use. Total (direct, indirect, and induced) employment generated by livestock grazing authorized by BLM would be about 90 FTEs.

72 Table 3-1

Add the following footnote: These figures are estimates of future levels and their utility comes more from providing a comparative analysis rather than absolute levels of vegetative impacts.

80 Column 2, paragraph 4

Replace the first sentence with: "Estimated sediment yield figures for the existing environment and alternatives are listed in Table 3-6." Refer to Appendix E for an explanation of the methodology in calculations.

Following the 4th sentence, add: "On Table 3-6, the majority of change in sediment yield estimates, from the existing environment to the alternatives, would result from changes in the land use factor, in response to adjustments in grazing treatments."

81 Column 1, paragraph 1

At the beginning of the paragraph, insert: "Table 3-6 also lists estimates of percent vegetative cover for the existing environment and alternatives. These percentages are proportionate with sediment yield estimates and the percent cover calculated for the Proposed Action." Refer to Appendix E for an explanation of the methodology in calculations.

82 Table 3-6

Column 3, change the number 12 to 24. By using the same ratio that was used for the other figures the cover figure for Alternative 1 would be 12. However, because acreages in the range condition classes and apparent trend categories are similar in the existing environment and Alternative 1, their values for percent vegetative cover also would be similar.

PAGE**85 Proposed Action, Streams**

Add the following: Changes to fish populations and fish habitat are displayed in Tables 3-9, 3-11, 3-12, 3-13, and 3-14.

85 Streams-Fish Habitat

First sentence should read: Fish habitat would improve when public land segments on streams such as South and North Fork Owl and Cottonwood Creeks are rested for several years to initiate restoration of bank and channel habitat.

87 Figure 3-1

See Revised Figure 3-1.

89 Table 3-9

See Table 3-9 additions.

93 Table 3-10

Total Forage Consumed under Alternative 4 should be: 113,283—100. The footnote with the *, second sentence should read: For example: 45—40 under antelope and sheep indicates a dietary overlap of 45 percent in desert habitats and a 40 percent dietary overlap in mountain foothill habitats.

97 Table 3-11

See Table 3-11 additions.

98 Table 3-12

See Table 3-12 additions.

99 Table 3-13

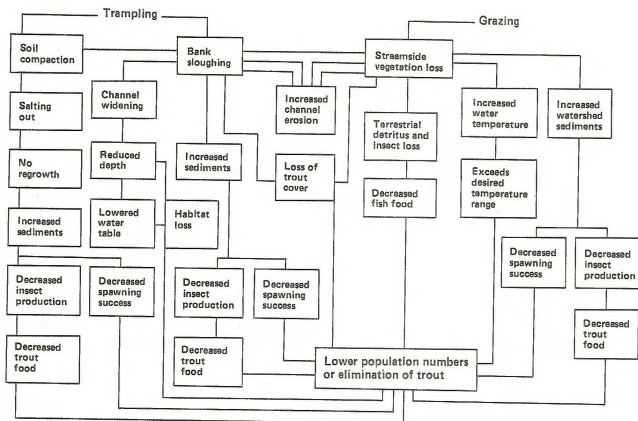
See Table 3-13 additions.

100 Table 3-14

See Table 3-14 additions.

103 LIVESTOCK GRAZING

First paragraph last sentence should read: During the past five years, average annual total use was 127,400 AUMs (99,372,000 lbs. of forage).



Modified from Armour - 1977

Figure 3-1

IMPACTS TO TROUT HABITAT FROM INTENSIVE LIVESTOCK USE OF STREAM ZONES

REVISIONS TO TABLE 3-9

SUMMARY OF LONG-TERM WILDLIFE IMPACTS OF THE PROPOSED ACTION

Qualitative Analysis ^{5/}	Treatment Combinations	Category ^{1/}	Waterfowl	Trout
Rest Pastures	1	I	+3	+1
Use Pastures	1	I	-2	-3
Spring Rest	2	I	+2	+1
Other Use Pastures	2	I	-2	-2
Deferred Use	3	I	+1	+1
Stream Bottom Livestock Use		I, M, C	NA	-2
Wetland Livestock Use		I, M, C	-2	NA
Growing Season Livestock Use		M, C	-2 *	-2 *
Non Growing Season Livestock Use		M, C	-1 *	-1 *
Livestock Use Adjustment		I, M, C	0	0
Wild Horse Adjustments		I	NA	NA
Fences ^{2/}		I, C	NA	NA
Water Developments ^{2/}		I	+3	+1
Ripping ^{2/}		I	NA	NA
Prescribed Burning ^{2/}		I	NA	NA
Rotary Cutting ^{2/}		I	NA	NA
Brush Spraying ^{2/}		I, M, C	NA	NA
Monitoring Lag Period		I, M, C	-2 *	-2 *
Qualitative Total			+2	+1

Quantitative Analysis	Category	Waterfowl (Reservoirs)	Trout
Habitat Alteration (Estimated Acres)	I, M, C	421 Existing 110 New or Modified	50 Miles 4 Reservoirs
Change in Estimated ^{4/} Carrying Capacity (2)		+50	+100

REVISIONS TO TABLE 3-11

SUMMARY OF LONG-TERM NET WILDLIFE IMPACTS OF ALTERNATIVE #1 (NO CHANGE) ^{1/}

Qualitative Analysis	Waterfowl	Trout
Treatment Combination 1	0	0
Treatment Combination 2	0	0
Treatment Combination 3	0	0
Stream Bottom Livestock Use	NA	-2*
Wetland Livestock Use	-3*	NA
Growing Season Livestock Use	-3*	-3*
Non-Growing Season Livestock Use	-1*	-1*
Preference Grazing	0	0
Wild Horse Adjustments	0	NA
Fences	NA	NA
Water Development	0	0
Qualitative Total	-2*	-3*

Quantitative Analysis		
Change in Estimated Carrying Capacity (%)	0	-50

REVISIONS TO TABLE 3-12

SUMMARY OF LONG-TERM NET WILDLIFE IMPACTS OF ALTERNATIVE #2
(NO ACTION - NO LIVESTOCK GRAZING) ^{1/}

Qualitative Analysis	Waterfowl	Trout
Livestock Grazing Permit Expiration	+3	+3
Wild Horse Adjustments	0	0
Fences	0	0
Qualitative Total	+3	+3

Quantitative Analysis ^{2/}		
Change in Estimated Carrying Capacity (%)	+300	+100

REVISIONS TO TABLE 3-13

SUMMARY OF NET WILDLIFE IMPACTS OF ALTERNATIVE #3 (OPTIMIZE LIVESTOCK GRAZING)^{1/}

Qualitative Analysis	Waterfowl	Trout
Treatment Combination 1	+1	-1
Treatment Combination 2	+1	-1
Treatment Combination 3	+1	-1
Stream Bottom Livestock Use	NA	-3*
Wetland Livestock Use	-1*	NA
Livestock Only Veg. Use Adj.	0	0
Wild Horse Removal	NA	NA
Fences	NA	NA
Water Developments	+2	0
Ripping	NA	NA
Prescribed Burning	NA	NA
Rotary Cutting	NA	NA
Brush Spraying	NA	-1
Monitoring Lag Period	-2*	-2*
Qualitative Total	+1	-3
<hr/>		
Quantitative Analysis ^{2/}		
Change in Estimated Carrying Capacity (%)	+30	-40

REVISIONS TO TABLE 3-14

SUMMARY OF NET WILDLIFE IMPACTS OF ALTERNATIVE #4 (MANAGE FOR OTHER GRAZING USES) 1/

Qualitative Analysis	Waterfowl	Trout
Treatment Combination 1	+1	-1
Treatment Combination 2	+1	+1
Treatment Combination 3	+2	+1
Stream Bottom Livestock Management <u>2/</u>	+1	+3
Wetland Livestock Management <u>2/</u>	+3	+2
Application Range Suitability	NA	NA
Forage Allocation for All Uses	NA	NA
Wild Horse Adjustments	0	NA
Fences	NA	NA
Water Developments	+3	+3
Ripping	NA	NA
Prescribed Burning	NA	NA
Rotary Cutting	NA	NA
Brush Spraying	NA	0
Qualitative Total	+2	+2
<u>Quantitative Analysis <u>2/</u></u>		
Change in Estimated Carrying Capacity (%)	+300	+200

PAGE

Fourth paragraph, last sentence should be deleted.

110 Change:

Wild Horses of America to Wild Horse Organized Assistance

A2 - A5 Table A1:

The following allotments were not inventoried and the supply is unknown: 0063, 0520, 0583, 0587, 0599, 0600, 0601, 0611, 0629, 0630, 0631, 0670, 0680, 1065, 2511, 2522, 2540, 2551, 2562, 2563, 3035.

The following allotments were inventoried, but the supply is combined with that of another allotment: 0584, 0720, 0721, 0722, 2508, 2526, 2527, 2534, 2537, 2539, 3091, 3103.

Allotment 0646 should read: Grasses 2,337; Total Vegetation Forbs 670; Shrubs 1,166; Total Production 4,173.

Estimated total supply should read: Grasses 214,269; Total Vegetation Forbs 108,321; Shrubs 302,616; Total Production 625,206.

A6 - A8

See Revisions to Table A2.

B2 - B9

See Revisions to Tables B1, B2, and B3.

C5 Allotment 0510 & 2508 & 3091

Should read: 0510 & 2508.

C10 Footnote 1

Should read: 1978 G&F strategic plan with revisions through 1981 (these mule deer numbers are similar to the 1963-1965 population estimates).

C10 Footnote 2

Add the following: The numbers for deer are derived from average population counts from 1974-1979, as per consultation with Cal King of the G&F on June 18, 1982.

PAGE

D18

The title should read: METHODOLOGY FOR VEGETATION AND FORAGE SUPPLY. The first subheading should read: Methodology for Vegetation Inventory.

The second paragraph eighth and ninth sentences should read: Enough plots were done on each transect to be within 25 percent of the mean average weight with 75 percent confidence. That is the weight of the vegetation in the plots will be within + or - 25 percent of the mean average weight for the sampled area.

The third paragraph should be replaced by: Explanation of supply data contained in Appendix A, Table A1, pages A-1 through A-5, was included in Appendix D, pages D-18 to D-20, to give a brief explanation of the SVIM inventory from which the figures were taken. The estimated pounds production listed by grasses, forbs, and shrubs is the average annual vegetative production. This includes all species of both annual and perennial plants up to 4.5 feet above the ground. This production data was then entered into the computer by plant species. Seasons of use were entered by animal species (wildlife and livestock).

Proper use of vegetation varies with season of use, diet of the animals, weather, and other factors. The formula used to calculate proper forage use is complicated and not easy to verbalize. Proper use for a particular plant is defined as "the degree to which the current annual growth can, and is expected to, be utilized by a specific kind of foraging animal during each season without abusing the range." The process of Proper Use Factors (PUF) development, hinges on two elements: allowable use determination and dietary preference ratings. "Allowable use" is the percentage of the annual production of a plant species that can be removed by grazing without permanent damage to the plant. This percentage was determined for each season and was expressed as the percentage of each year's annual production available for grazing during each season (spring, summer, fall, and winter).

As part of the inventory, the amount of growth at different times was measured for the main plant species. The amount of growth was then plotted on a graph by season. Refer to the attached illustration for the squirrel tail growth curve. The percentage of the area under the growth curve indicates the production available for each season. In the absence of specific information about the maintenance and reproductive requirements of each kind of plant, utilization levels for most grasses, grass-like plants, and forbs were set at a maximum of 50 percent of the annual production, and most shrubs

REVISIONS TO TABLE A2

ESTIMATED DEMAND FOR FORAGE BY
LIVESTOCK, WILDLIFE, WILD HORSES, FOR EACH ALTERNATIVE
(1,000 Pounds Forage on Public, Private, State Lands)

Allotments	Proposed	Alt. 1	CATEGORY M		Alt 3.	Alt. 4
			Alt. 2			
0536 Wildlife	21	20	21/90		21	21
0540 Livestock	536	536			536	67
0604 Wild Horses	216	216	216/884			216
"M"						
Total Livestock	38,586	38,586			38,586	23,003
Wild Horses	216	216	216/884			216

The estimated supply for the following allotments is unknown: 0520, 0587, 0599, 0600, 0601, 0630, 0670, 0680, 2511, 2522, 2540, 2551, 2562, 2563, 3035.

The estimated supply for the following allotments is combined with that of another allotment: 0584, 0720, 0721, 0722.

REVISIONS TO TABLE A2

ESTIMATED DEMAND FOR FORAGE BY
LIVESTOCK, WILDLIFE, WILD HORSES, FOR EACH ALTERNATIVE
(1,000 Pounds Forage on Public, Private, State Lands)
(Cont'd)

Allotments	Proposed	Alt. 1	CATEGORY I		Alt 3.	Alt. 4
			Alt. 2			
0510/ 2508/ 3103						
0541 Livestock	246	246			246	20
Wildlife	82	77	82/86		82	82
0542 Livestock	425	425			425	71
0620 Livestock	1,380	1,380			1,380	340
0621 Livestock	285	285			285	109
Wildlife	48	25	48/146		48	48
0652 Wild Horses	324	324	324/695			324
0662 Wild Horses	216	216	216/492			216
0669 Wild Horses	108	108	108/346			108
1070 Wild Horses	216	216	216/169			216
"I"						
Total Livestock	80,535	80,535			80,535	31,101
Wildlife	8,337	7,161	8,337/32,900		8,337	8,337
Wild Horses	864	864	864/3,094			864

The estimated supply for the following allotments is combined with another allotment: 2508, 3091, 2526, 2537, 2539.

REVISIONS TO TABLE A2

ESTIMATED DEMAND FOR FORAGE BY
LIVESTOCK, WILDLIFE, WILD HORSES, FOR EACH ALTERNATIVE
(1,000 Pounds Forage on Public, Private, State Lands)

Allotments	Proposed	Alt. 1	CATEGORY C ₁		Alt. 3.	Alt. 4
			Alt. 2			
0543 Livestock	46	46			46	25
"C 1"						
Total Livestock	12,304	12,304			12,304	5,241

Estimated supply for 0063 is unknown and supply for 3103 is combined with another allotment.

CATEGORY C₂

0631 Livestock	19	19		19	19
Wildlife	10	10	10/49	10	10
"C 2"					
Total Livestock	935	935		935	351
Wildlife	226	217	226/585	226	226
Wild Horses	--			--	--

Estimated supply for the following allotments is unknown: 0583, 0611, 0629, 0631, 1065, 2534.

Supply for allotment 2527 is combined with that of another allotment.

REVISIONS TO TABLE A2
ESTIMATED DEMAND FOR FORAGE BY
LIVESTOCK, WILDLIFE, WILD HORSES, FOR EACH ALTERNATIVE
(1,000 Pounds Forage on Public, Private, State Lands)

Allotments	Proposed	REVISED CATEGORIES TOTALS			
		Alt. 1	Alt. 2	Alt. 3.	Alt. 4
"M" Livestock	38,586	38,586	0	38,586	23,003
Wildlife	6,593	5,543	6,593/23,000	6,593	6,593
Wild Horses	216	216	216/844	0	216
"I" Livestock	85,535	85,535	0	85,535	31,104
Wildlife	8,337	7,161	8,337/32,900	8,337	8,337
Wild Horses	864	864	978/3,094	0	864
"C 1" Livestock	12,304	12,304	0	12,304	5,241
TOTAL Livestock	132,365	132,365	0	132,365	59,696
Wildlife	16,727	14,299	16,727/63,081	16,727	16,727
Wild Horses	1,080	1,080	1,080/3,938	0	1,080

REVISIONS TO TABLE A2

ESTIMATED DEMAND FOR FORAGE BY
LIVESTOCK, WILDLIFE, WILD HORSES, FOR EACH ALTERNATIVE
(1,000 Pounds Forage on Public, Private, State Lands)
(Cont'd)

METHODOLOGY

(Origin of Figures in Demand Table for the
Proposed Action and the Various Alternatives)

Proposed Action	Alt. 1	Alt. 2	Alt. 3	Alt. 4
Wildlife		First number indicates level recommended in MFP. Number following (/) indicates numbers possible with no livestock. Antelope numbers were limited to MFP level x 10.		
Wild Horses		First number indicates level recommended in MFP. Number following (/) indicates numbers possible with no livestock on these allotments that now have horses.		

REVISIONS TO TABLE B1

LIVESTOCK GRAZING SUMMARY - CATEGORY M

		ACRES				AUM's								
Allotment Number	Allotment Name	Federal	State	Private	Total	Federal		State	Private	3/ Total Demand	4/ Livestock Class	Historical Season of Use		
						1/ Active Preference	2/ Average 5- Yr. License							
0540	Bridges	920	0	880	1,800	190	156	0	497	687	C	5/10-5/24; 7/1-9/30		
0595	Iron Creek	1,364	0	440	1,804	410	410	0	117	527	C	8/7 - 10/29		
0616	Horse ^{5/}	3,742	590	0	4,332	378	283	90	0	468	C	4/15 - 11/15		
0638	Individual	4,480	640	0	5,120	519	289	49	0	617	C	12/01 - 3/17		
0646	Back of Rim	6,090	640	1,040	7,770	635	635	80	157	872	C	11/01 - 2/28		
0647	Steer	2,144	0	680	2,824	340	340	0	165	505	C	11/01 - 2/28		
0650	South Gebo Common	2,000	0	0	2,000	181	164	0	0	181	C	9/01 - 11/15		
0657	West Allotment	1,000	640	26	1,666	90	90	57	20	167	C	9/01 - 11/15		
0661	3 Peaks Anchor	5,558	0	10,008	15,566	721	761	0	3,300	4,021	C	6/08 - 10/22		
											H	1/01 - 12/31		
2538	Section 15	1,818	0	0	1,818	200	200	0	0	200	C	11/01 - 2/28		
TOTAL FOR "M" CATEGORY		170,151	18,528	100,722	289,401	22,803	19,959	3,462	25,198	50,212				

REVISIONS TO TABLE B2
LIVESTOCK GRAZING SUMMARY - CATEGORY I

		ACRES				AUM's							
Allotment Number	Allotment Name	Federal	State	Private	Total	Federal		State	Private	Total Demand	4/ Livestock Class	Historical Season of Use	
						1/ Preference	2/ Average 5- Yr. License						
0590	Sand Draw	2,481	0	0	7,006 *	196	421	0	0	672	C	6/16 - 9/20	
0510 +	Fernandez Blu-Jay 5/	6,726	196	1,597		698		25	200				
3103	Section 15	809	0	0	10,009	72	662	0	0	1,061	C	5/16 - 10/15	
0541	Three Peaks	560	0	640	1,200	60	18	0	256	316	C	7/01 - 9/30	
0542	Rock Creek	1,960	0	1,320	3,280	215	125	0	330	545	C	7/01 - 8/31	
0607	Lake Creek	3,704	0	2,961	6,368	734	736	0	630	1,364	C	4/20 - 2/28	
0620	Prospect 5/	4,940	1,200	970	7,110	1,205	1,249	311	253	1,769	C	6/01 - 11/7	
0634	Lower Pastures 5/	9,772	720	896	11,388	1,731	1,977	142	195	2,068	C	10/01 - 6/15	
0639	Tatman Mountain Common	17,535	1,012	1,900	20,447	2,333	1,580	90	392	2,814	C	5/16 - 10/15	
											S	11/01 - 2/28	
0642 +	Red Canyon (+ Section 15)5/ (2539)	1,293 (+5,262)	0	4,732	11,287	162 (+1,194)	1,355	0	1,144	2,700	C	4/10-8/1;10/16-12/15	
TOTALS FOR "I" CATEGORY		609,862	52,364	109,199	771,425	71,470	52,233	8,762	23,172	103,404			

REVISIONS TO TABLE B3

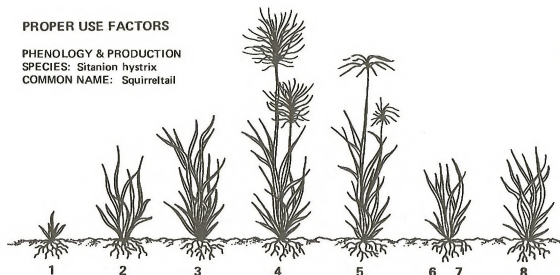
LIVESTOCK GRAZING SUMMARY - CATEGORY C₁

Allotment Number	Allotment Name	ACRES				AUM's							Historical Season of Use
		Federal	State	Private	Total	Federal		State	Private	Total Demand	Livestock Class		
						1/ Active Preference	2/ Average 5- Yr. License						
0504	Hamilton Dome	11,904	640	290	12,834	799	805	41	33	873	C	5/01 - 6/15, 11/1-2/28	
0512	Coulter Group	11,428	590	175	12,193	666	535	47	13	726	H	4/01 - 11/30	
0543	Cannady Individual	1,146	0	169	1,315	51	63	0	8	59	C	5/01 - 9/30	
	TOTALS FOR C ₁ CATEGORY	167,094	4,418	14,214	186,027	13,093	8,737	581	2,073	15,747		5/16 - 8/15	
	TOTALS FOR ALL CATEGORIES	962,229	75,630	224,975	1,262,834	108,367	81,343	12,849	50,603	171,819			

PROPER USE FACTORS

PHENOLOGY & PRODUCTION

SPECIES: *Sitanion hystrix*
COMMON NAME: Squirreltail



PHENOLOGY STAGES: Grasses, Forbs, Shrubs & Trees

CODE NO. DESCRIPTION

- 1 Begin Growth
- 2 Vegetative Stage
- 3 Boot Stage
- 4 Peak Flowering
- 5 Seed Ripen
- 6 Mature
- 7 Dormant
- 8 Regrowth

———— Production Dry Weight
- - - - Projected (No Data)

HOW PROPER USE FACTORS WERE DEVELOPED

Proper Use Factor (PUF) — "Proper Use" for a particular plant is the degree to which its current (seasonal) growth will be utilized by a kind of grazing animal when the range is properly used.

Allowable Use Factor (AUF) — "Allowable Use" is the percent of ANNUAL, above ground vegetation produced by a plant species that can be grazed by herbivorous animals without sustained physiological damage to the plant. The upper limits for Allowable Use are set at: Grasses and Forbs — 50%, Shrubs — 35%.

AUF = % Total Production X Allowable Use by Season
Dietary Preference (DP) — Grazing animals have varying preference or relish for different plant species. The plants were given values from 0 to 1.0 depending on palatability, unavailability and season.

Proper Use Factor Formula: $PUF = AUF \times DP$

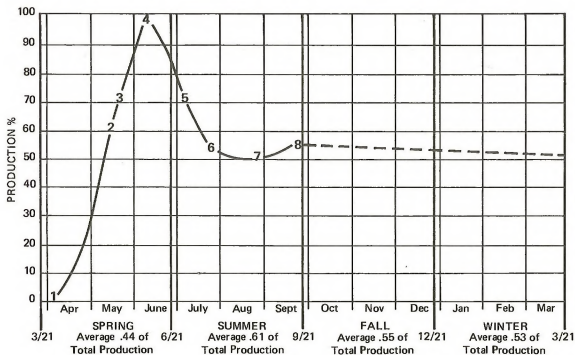
For example, PUF for Cattle - Spring Season on Squirreltail was developed as follows:

% Total Production (.44) x 50% = .22 AUF
.22 x .7 DP = .154 or .15 PUF

Summary Table for Squirreltail - Cattle

Season	Spr	Sum	Fall	Win
Production	.44	.61	.55	.53
AUF	.22	.31	.28	.27
DP	.7	.8	.9	.7
PUF	.15	.25	.25	.20

Note: PUF's are rounded to nearest 5%.



at 35 percent of the annual production using general information on plant requirements. This forage utilization level was then multiplied by the percent of the annual production available during each season to arrive at the allowable use value. For example, the squirrel tail in the illustration has produced 44 percent of its production in the spring. Therefore 50 percent of this production can be taken or a 22 percent allowable use factor for spring use. The proper use for a particular plant cannot exceed the allowable use.

Because a plant can be eaten by animals does not mean that it will be. If a plant is not eaten either because it is not available during certain times or because the animal does not like it, the proper use value must be low. Therefore, whether animals will eat a plant or not must be part of the proper use factor formula. We assessed seasonal food preferences of the major animals studying research done by others. Also, in 1979, we conducted a fecal analysis study by season for livestock, wild horses, antelope, mule deer, bighorn sheep, elk, and moose throughout the Grass Creek area to help determine what they are eating.

The amount of use by each animal in each season was given a multiplier: 1.0 (heavy), 0.5 (moderate), 0.2 (light), and 0.0 (none). These multipliers are then used in the PUF formula. Example: A study says that mule deer use big sagebrush at a rate of 1 percent in spring, 0 percent in summer, 4 percent in fall, and 88 percent in winter. These values fall into our classes as follows: spring (light, 0.2); summer (none, 0.0); fall (moderate, 0.5); and winter (heavy, 1.0).

Those plants for which no food habit information could be found were either assigned the same dietary preference value as a very similar plant, or were assigned no dietary preference value at all (i.e., ephemeral annuals because their production is not dependable from one year to the next).

Once the Allowable Use Factors (AUFs) were derived and the Dietary Preference values (DPs) were assigned, the proper use factors could be developed from the formula: Allowable Use Factor (AUF) x Dietary Preference (DP) = Proper Use Factor (PUF).

Proper Use Factor tables were then assembled for each major plant species by animal, and season of use. The proper use factors were then incorporated into the computer program.

Therefore, if the use is during the spring, the total usable vegetation will be low due to the allowable use factor. Also any area within an allotment that was identified as unsuitable or potentially suitable for livestock is not included in the usable figure and, if most of the plants are not the kind that are eaten or they are annuals, the usable pounds would be a low percent of the total production. Thus, the percent usable vegetation is determined by the kind and season of animals using the area and types of plants and amounts available for use.

The fifth paragraph should read: The pounds of forage required by various animals for one month is: cattle 780, horses 900, mule deer 103, antelope 74, sheep 150, elk 374, moose 674, and bighorn sheep 116.

Add paragraph nine: There are uncertainties inherent in any inventory of and evaluation of vegetation, as it is changing constantly.

D20 Land Treatment

Last sentence should read: For example, a treatment on loamy and sandy sites with 5 to 9 inches of precipitation could increase forage production from 250 lbs. to 400 lbs. and change carrying capacity from 22 acres per AUM to 13 acres per AUM.

F-4 Table F1

See Revisions to Table F1.

I-1 Appendix I

The title of Appendix I should be Economics.

ADDITIONS TO BIBLIOGRAPHY

Gee, Kerry C., and Danny L. Briskey. 1982. Effects of Reductions in Federal Grazing Permits on Sheep Ranch Value and Borrowing Capacity, Colorado State University Experiment Station, Fort Collins, Bulletin 583S.

Killough, John R. 1977. Land Use and Environmental Analysis For the L.U. Sheep Company.

REVISIONS TO TABLE F1

SUMMARY OF STANDARD VIOLATIONS AND USE IMPAIRMENTS¹

<u>Stream and/or Stream Segment</u>	<u>Problems</u>	<u>Standard Violation</u>	<u>Dates, Values & Locations of Stand Viol.</u>	<u>EPA Criteria Exceeded</u>	<u>Dates, Values Stream and/or Criteria Exceeded</u>	<u>Sources</u>
Fifteenmile Creek	Sediment loading to Bighorn River causing fishery and aesthetic degradation	Yes		Yes	During any runoff event	Natural & acceler- ated erosion of Willwood Formation
Red Canyon Creek	Turbidity and sedi- mentation of Bighorn River. Possible effects on fishery in Bighorn River	No		Yes	During runoff events which deliver flow to the Bighorn River	Natural erosion; possible over- grazing in drainage

¹Data from 208 Water Quality Management Plan and BLM inventories.

CONSULTATION AND COORDINATION ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Public Participation

The following is a summary of the involvement opportunities given to the public and government agencies during the land use planning process (the basis for the proposed action) as well as during EIS scoping and preparation:

—In July, 1976 a Preplanning Analysis was begun as well as a plan for public participation. District advisory board, county commissioners and key individuals were contacted to identify issues.

—From 1976 through 1980, BLM resource specialists contacted individuals and interest groups to explain the planning process and gain information. BLM contacted city, county and state governments, other federal agencies and congressional delegations to keep them informed of progress and seek input on recommendations. During this period, a number of releases to local news media were made as well as appearances by BLM on local radio "talk shows" explaining the BLM's planning process and inviting input.

—During the same period of 1977-1980, the BLM conducted intensive inventories including SVIM. Several workshops were held during this period to explain the inventory process to local ranchers and other interested parties.

—During and following the SVIM inventory process, individual ranchers were consulted by BLM about problems and opportunities in their allotments, updating of allotment files and determining grazing suitability. Input was solicited at each of these meetings for the land use plan as a whole as well as individual allotments. All but a few operators were contacted, some of them several times.

—In June 1981, the Notice of Intent to prepare an EIS was published in the Federal Register.

—In July 1981, the BLM issued a proposed rangeland management policy and it was determined that the Grass Creek EIS would be prepared under this policy. A series of public meetings were held throughout the Basin to explain the new policy and acquire public input into the development of criteria needed to categorize allotments. The multiple use advisory council was also contacted. Local realty and financial institutions were contacted individually to explain the new policy.

—After allotments were categorized, livestock operators were contacted to discuss individual allotments. County governments and Wyoming Game and Fish were kept informed during this process.

—In August and September 1981, the BLM Multiple Use Advisory Council was involved in the conflict resolution portion of land use planning as were several interest groups and key individuals.

—In September, a public meeting was held to discuss proposed multiple use recommendations. This was followed by a series of "open houses" for the same purpose and the EIS scoping meeting was held.

—Consultation with U.S. Fish and Wildlife Service regarding threatened and endangered species is taking place.

Throughout the planning and EIS process numerous items of information and comments were received from agencies, organizations and individuals. This information was evaluated and used and the written information is being kept on file at the Worland District Office.

EIS Review

A news release was issued statewide announcing its availability. Two months were provided for public review.

The Draft Grass Creek Grazing Management Environmental Impact Statement was filed with Environmental Protection Agency and released to the public on April 9, 1982, and open to comment until June 11, 1982. The DEIS contains a list of agencies, organizations, and individuals from whom comments were requested.

All letters were reviewed and considered. Comments which raised questions or issues bearing directly upon the environmental effects of the proposed action, presented new data, or questioned facts and/or analyses, are responded to separately. Comments identifying errors or omissions are also included.

All letters have been reproduced in this final, with each answerable comment identified and numbered. BLM responses are printed with each of the letters.

In most cases, only comments pertaining to the adequacy of the DEIS (i.e., the analysis as distinct from the actions analyzed) are formally responded to in this document. However, all comments (oral and written), and any new information will be taken into account when the final decision regarding rangeland management is made.

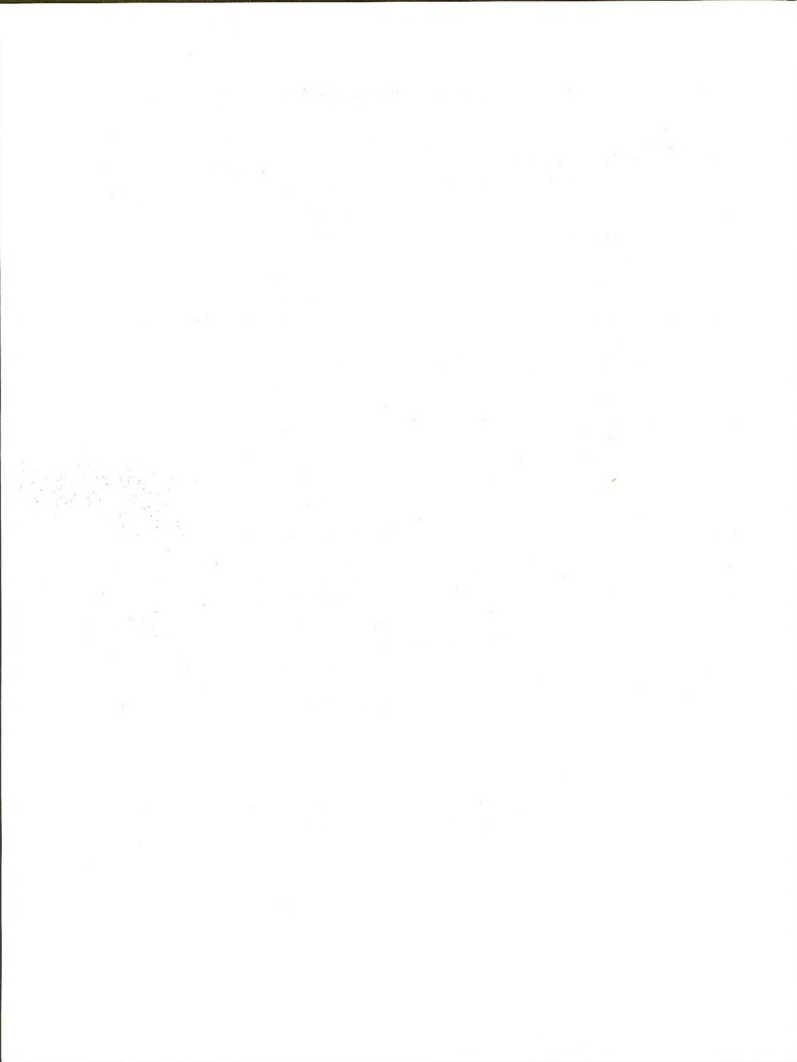



Comments on EIS

The letters listed below are in the order they were received at the Worland District Office.

1. National Audubon Society, Rocky Mountain Regional Office
2. Dennis W. Jones
3. Wildlife Management Institute
4. Frank Rhodes
5. U.S. Fish and Wildlife Service, Billings Area Office
6. L.U. Sheep Company
7. Gerald E. Geis
8. National Park Service, Rocky Mountain Regional Office
9. Wild Horse Organized Assistance
10. Hot Springs County Range and Livestock Board, Kirk Nielsen
11. Hot Springs County Range and Livestock Board, Joe Campbell
12. Allen L. Schweighart
13. R.J. Campbell
14. Kenneth W. Martin
15. University of Wyoming, Division of Range Management, F.E. Busby and J. Daniel Rodgers
16. Hot Springs County Sportsman's Association
17. Tony Abstetar
18. Hillberry Cattle Co., Georgie Hillberry and Everett Seaton
19. Wyoming Advocates for Animals
20. Jay C. Mathews
21. John Rankine
22. Roland H. Gilbreath
23. Stanley Pennoyer
24. Big Horn Basin Wildlife Club
25. Ed Cormier
26. Ed Shaffer
27. Thomas Baird
28. LaVerne M. Nelson, P.E.
29. Matt M. Brown
30. Anthony M. Martinez and Betty Jean Martinez
31. Ranul Dvarvishkis
32. Wyoming State Grazing Board, Dick Loper
33. Robert E. Dohse
34. Myron Jones
35. Governor of Wyoming, Ed Herschler
36. Wyoming Department of Agriculture, Don Daiss
37. Wyoming Department of Agriculture, Collin Fallat
38. Wyoming Department of Environmental Quality
39. Wyoming State Highway Department
40. Wyoming Recreation Commission
41. State Historic Preservation Office
42. State Engineer's Office
43. Wyoming Game and Fish Department
44. Calvin L. King
45. U.S. Environmental Protection Agency, Region VIII
46. University of Wyoming, Division of Range Management, F.E. Busby

Copies of all written comments are available for public review at the Worland District Office.




National Audubon Society
 ROCKY MOUNTAIN REGIONAL OFFICE
 430 DARLEY, SUITE 1, BOULDER, COLORADO 80501 (303) 440-4121

RECEIVED
 APR 22 1982
 REGIONAL OFFICE

1
 APR 16, 1982

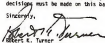
Maxwell T. Linsinger
 State Director
 Bureau of Land Management
 P.O. Box 1808
 Cheyenne, Wyoming 82001

Re: Grass Creek MEIS, Elkhorn Basin, Wyoming

Dear Mr. Linsinger:

In general, our regional office supports the proposed action as being a significantly better choice than the other four alternatives.

We do, however, urge that 1) extremely close attention be paid to the nearby forest population - within 7 mi. of the site; 2) such greater care and concern be made in the management plan specific for sagebrush wildlife species and habitat; and 3) the wild ruminant population be maintained at approximately the present population (approximately 250) rather than reduced to the 100 level. Acquisition of a 900-acre meadowland for forage allotment and shortage of available water supplies during certain critical months. It is recommended and proper management decisions must be made on this basis.

Sincerely,

 Robert C. Turner
 Regional Vice President

AMERICAN COMMITTEE TO CONSERVATION
 1000 Avenue D

RESPONSE TO LETTER NO. 1

1.1 We are aware that there are impacts to non-game animals, but we have no data to substantiate the significance of these impacts. For the purposes of this analysis, we assume they are insignificant. Recommendations for management of non-game species are made in the MFP.

RECEIVED
 MAY 12 1982
 REGIONAL OFFICE

2
 May 11, 1982

Bureau of Land Management
 Box 119
 Garland, Wyoming 82401

Dear Sirs:

I have need of clarification and/or correction of several items that caught my attention in the draft EIS.

2.1 The antelope distribution map indicates that Allotment 2538, in the General Summer Use Area. In approximately 40 years of observation, I have never seen antelope in this Allotment. This Allotment adjoins the Wind River Indian Reservation and very few antelope survive these years around hunting.


2.2 Ecological complex map indicates riparian for Red Canyon Creek, after seldom runs in Allotment 2538, except during heavy thunderstorms. I do not feel riparian should refer to dry stream beds. Also, this Allotment is only used from November thru February and I do not believe much damage could be done to the creek banks.

2.3 Season of use is listed wrong for this Allotment, as indicated on page B-4, Appendix B. I also doubt the validity of the statement made on page F-4, Appendix F, "natural erosion accelerated by overgrazing". The sheer cliffs and steep slope on the North side of Red Canyon Creek offer nothing to hold thunderstorm runoff beds. And, they are too steep, according to your criteria for grazing. I would wager that the profile of these Red Rims has changed very little since they were formed by the glaciers. Table F-1 also states that this criterion is exceeded "during any rainstorm". I need a definition of rainstorm.

2.4 On page A-5, Appendix A, total usable vegetation is only 22 1/3% of total production or 38 2/3% of grasses. This either needs to be evaluated or explained, or I am understood it. I would also like to know if cotton, soap weed and other similar plants are part of usable vegetation.

2.5 On page A-6, Appendix A, I need an explanation of the numbers. Referring to page C-10, Appendix C, there is very seldom any natural water in this Allotment. Any increase in deer numbers would put more pressure on irrigated farm lands on the West side of the Big Horn River, as the deer would normally go there to drink.

I would be glad to meet with you at any time, to clarify the questions and discrepancies noted above.

Sincerely,

 Dennis W. Ames
 Box 671
 Thermopolis, Wyo. 82451

cc: Range Users
 Hot Springs Co.
 Range & Livestock Bureau

RESPONSE TO LETTER NO. 2

2.1 The distribution map indicates general occurrence only. Typical antelope habitat occurs here, and antelope are found in adjacent allotments. Transient antelope may use this area, and future monitoring should either confirm or refute this. Appendix C (page C-10) does not indicate any antelope management objectives (either present or future) for this allotment.

2.2 Red Canyon Creek meets the definition given in the glossary of being a riparian zone. Within Allotment 2538, there is a continuous narrow band of stream channel associated grasses and forbs. Narrowleaf and plains cottonwood and willow are established at intervals along the creek. Two species of rush are established in the upper end of the allotment. Natural flow from upstream springs was reaching the southwest quarter of Section 21 on May 26, 1982 (BLM observation). Later in the year, the channel no doubt dries up further upstream and only flows during rainstorms. Although winter use of streams by livestock is considered least detrimental, concentrated use does affect the stream channel. In Allotments 2538 and 2539, livestock use on cottonwood and willow seedlings is preventing them from maturing. It also appears that the banks have been affected by past livestock use on Red Canyon Creek.

2.3 See Text Revision page B-4, Appendix B.

2.4 BLM is required by law to consider planning documents of other state, city, and county agencies. BLM did not collect water quality data on Red Canyon Creek, it came from assessments within the Big Horn Basin 208 Water Quality Management Plan, Regional Planning Office 1979. Also, see Text Revision Appendix F, page F-4, Red Canyon Creek.

2.5 See Text Revision page D-18, Appendix D. Explanation of supply data contained in Appendix A, Table A1, pages A-1 through A-5, was included in Appendix D, pages D-18 to D-20, to give a brief explanation of the SVIM inventory from which the figures were taken.

2.6 Table A2 is pounds of forage demand by alternatives. Refer to page A-15 for explanation of methodology for Table A2. Two hundred AUMs on the Allotment 2358 times 780 lbs/AUM would be 156,000 lbs. of forage. The SVIM inventory came out with 338,000 lbs. for livestock for the 6/1-9/30, and 11/1-3/31 season (Alternative 4). With only winter use, the forage requirement would be reduced to 550 lbs/AUM.


RESPONSE TO LETTER NO. 3

3.1 The AUMs that are identified for wildlife in all alternatives incorporate: (1) forage consumption rates by species for wildlife, (2) seasonal diets by species of wildlife, and (3) seasonal distribution by species of wildlife. Refer to the pages 11, 14, and 15 of the DEIS describing provisions for rest pastures in elk and antelope winter ranges as part of the proposed action.

3.2 "M" and "C" category allotments can be moved to an "I" category if monitoring indicates that significant wildlife conflicts are occurring and if the opportunity exists for management to improve the situation. Suspected conflict areas will be a priority for wildlife monitoring, regardless of the allotment category.

3.3 The worst case analysis was used to predict effects of grazing systems because we did not have the detail of each allotment to make specific allotment assessments in the EIS (see the introduction on page 71). Also, as stated on page 2, subsequent environmental assessments will be prepared at the allotment management plan level, or on other individual actions as needed (e.g. range improvements).

3.4 Monitoring program will be labor intensive, therefore, available work months will be committed to the high priority "I" allotments first. This was one of the reasons for the new categorization policy.



Wildlife Management Institute

200 West Building, 1000 Vermont Ave., N.W., Washington, D.C. 20005 • 202/347-1776

David A. Hovick
L. E. Jahn
L. E. Jahn
L. E. Jahn
L. E. Jahn
L. E. Jahn

Mr. John Neumann
John Neumann
Bureau of Land Management
Box 125
Vandenberg, Wyoming 82451

Dear Mr. Neumann:

3

May 28, 1982

RECEIVED
JUN 1 1982
BUREAU OF LAND MANAGEMENT
VANDERBURG, WYOMING

The Wildlife Management Institute is pleased to comment on GRASS CHECK CREATING SOFT ENVIRONMENTAL IMPACT STUDY, Wyoming.

The plan has several serious deficiencies for wildlife and needs improvement if wildlife is to receive its proper place on a major multiple use of the public lands.

Most of the wildlife management is based on assumptions; there are few details on how the land will be actually managed. Hardly leaving AUM's for wildlife does not consider seasonal needs or quality of forage left for wildlife, especially since no special protection is to be given the winter ranges.

The more we review plans based on 1, 2 and 3 classes of allotments, the more concerned we are that money and monitoring cannot help but be devoted to the Department lands. The M and C will be allowed to go "as is" even though they would be the most valuable wildlife lands to the area.

Management proposed for crucial winter ranges is not satisfactory.

Most of the wildlife, deer, elk and moose (and C) are not included on pages 68 and 69 will continue to decline. If wildlife are to be given multiple use of the public land, more must be done to meet their critical needs.

Recreation management is one of the serious, emerging conservation issues. To allow a continued decline of riparian vegetation on the M and C areas is not acceptable. (p. 90)

The entire plan will be based on 100% to be written sometime in the future. These are usually prepared by the permittee, least experienced range conservationists in the agency. Without detail on grazing systems and AUM's, it is impossible to predict effects.

Future actions, including livestock reductions, will be based on monitoring. In fact of reduced personnel and budgets, it is unrealistic to believe that the required studies of monitoring can be accomplished. What will monitoring cost and who will do it and on what basis? A better explanation is needed than is given on page 18.

DEDICATED TO WILDLIFE SINCE 1971

May 28, 1962

3.5

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3.7

3.6

3.9

These remarks have been coordinated with William B. Hesse, the Institute's Western Representative.

Samuel A. Lane

Daniel A. Poole
President

END-1100

Company or Government Service Draft.

41

42

1

44

We note that the last column in Table A1 starting on page A-2 is wrong and should be used.

Squad
Kendall Phillips

RESPONSE TO LETTER NO. 4

4.5 See text revisions for page C-10. BLM and G&F personnel met in late 1979 to estimate both present population and future goal number of animals per allotment. Cal King (G&F) was instrumental in this effort. The estimates are based on Game and Fish Department data collected over a period of years, as well as data collected by BLM during 1978 and 1979 inventories. Seasonal wildlife actual use monitoring has occurred since that time. Future monitoring should help verify actual wildlife use in the EIS area.



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Billings Area Office
Federal Building, Room 305
318 North 21st Street
Billings, Montana 59101-1396

AN-500 (REV. 10-79)

ES

June 1, 1982

MEMORANDUM

TO: John Moorhouse, Team Leader, ELN, Maryland, MT

FROM: Arne Messing, ESFS, Billings, MT (ES)

SUBJECT: Review of Great Creek Grazing Draft Environmental Impact Statement

We have reviewed the subject document. The following constitute the informal comments of the U.S. Fish and Wildlife Service.

In general, the draft is adequately prepared and sufficiently describes the existing environment and expected impacts. However, we find the expected impacts on wildlife to be very disturbing. For example, according to tables 2-6, 2-11, 2-12, and 2-13, only Alternative 2 (no livestock grazing and riparian/riparian management) and other grazing would benefit wildlife. The proposed action and Alternatives 1 (no change) and 3 (selective livestock grazing) would result in a further decline in wildlife and habitat conditions. We feel that we have no choice but to recommend total abatement of the proposed action and the other Alternatives 2 or Alternative 4 be adopted. Another option would be the formulation of a new alternative to the proposed action and the other Alternatives 2 or Alternative 4.

Another major concern is the condition of riparian/wetland habitat in the FIS area. We note that the riparian/wetland habitat associated with perennial streams is in severely poor condition with only 20 percent being in good condition. The riparian/wetland habitat that was evaluated and poor wetland vegetation (page 63). Although it is stated on page 61 that intermittent streams contain sun times the

5.1

RESPONSE TO LETTER NO. 5

5.1 Condition and trend of riparian habitat along intermittent streams is generally the same as discussed for perennial streams.

5.2 If the proposal is adopted wetland/riparian areas would generally continue to degrade during the initial monitoring period (page 85), but improvements would be expected after five years as typical grazing systems are implemented on "I" category allotments and special wetland/riparian management practices are implemented where needed to achieve specific goals. If significant degradation in wetland/riparian areas is identified in "M" and "C" category allotments, they can be changed to "I" category and the degradation problem addressed if management opportunities exist (page 6, RM1.1, 4; page 7, RM2.1, 4 and 5; and RM2.2, 3).

5.3 See page 53 of the EIS for reference to HMP development in wildlife recommendation #5.8. Big-horn sheep habitats do fall into the first priority for an HMP.

5.4 See Text Revision for page 64.

amount of wetland habitat that perennial streams do, no action is more of the condition of this habitat. As you are aware, wetland/riparian areas generally represent the most important habitat available to fish and wildlife resources, yet under the proposed action there will continue to be a decline of riparian vegetation in the "M" and "C" allotments (page 63). These allotments "M" and "C" represent about 25 percent of the entire FIS area in which nothing would be done to prevent the further decline of riparian habitat.

As you know, the ELP has recognized the importance of riparian/wetland habitat, and special emphasis has been given to the protection and enhancement of these areas. In terms of general policy, on February 3, 1982, the BLM published in the Federal Register (Vol. 47, No. 15, pages 7888-7895), Final Guidelines: Wetlands/Riparian Area Protection and Management Policy and Protection Procedures. Therein it is stated that "Riparian areas which presently or potentially support broad-leaved vegetation in arid and semi-arid regions are of special management concern" (emphasis added). One of the stated objectives is to "implement a management system to protect, maintain, and enhance all wetland/riparian areas administered by BLM." The guidelines further state that BLM policy will be to "Prevent the long and short-term adverse impacts associated with the destruction, loss or degradation of wetland/riparian areas," and "Preserve and enhance the natural and beneficial values of wetland/riparian areas which may include constraining or excluding those uses that cause sterilization, long-term ecological damage." Having reviewed the Great Creek EIS, we do not believe that these guidelines have adequately been observed. We recommend that, during preparation of the Final EIS an evaluation of an alternative, more adequate attention be given to wetland/riparian habitat needs.

5.2

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Another area of concern is the 67 percent reduction in carrying capacity for big-horn sheep anticipated to occur under the proposed action. Since only a small portion of the overall area is utilized by big-horn sheep, we recommend that for both the proposed and alternative wildlife habitat management plan as part of the proposed action that is designed to improve range carrying capacity for this species.

Requires endangered species, we were unable to find any mention of the peregrine falcon in your draft. Our list of endangered species, sent to you on February 1, 1982, included this species as well as the bald eagle and black-footed tern. We feel that the draft should reflect the fact that the consultation process does include the peregrine falcon. We await the receipt of your biological assessment on these three species.

We appreciate the opportunity to comment on the DEIS and sincerely hope the final EIS will reflect more consideration for the protection of fish and wildlife resources.

Sincerely,

 Wally Jones
 Area Manager

cc: Wyoming State Director, BLM, Cheyenne, WY
 Director, Wyoming Game and Fish Department, Cheyenne, WY
 USFWS, Washington D.C.
 USNM/USF, Washington D.C.
 Regional Director, USFS, Denver, CO (BKV)

-2-

AMERICAN SHEEP & HORSE RANCH
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6

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June 2, 1982

State Office, Bureau of Land Management, USDI
 P.O. Box 18200
 Cheyenne, Wyoming 82001

COMMENTS BY L. U. SHEEP COMPANY ON THE B.L.M. DRAFT
 GRASS-CRACK GRAZING ENVIRONMENTAL IMPACT STATEMENT.

In 1975, when the BLM was starting their Charlie Johnson EIS, and starting to try to plan their Grass-Crack EIS, we started our own EIS, entitled "LAND USE AND ENVIRONMENTAL ANALYSIS FOR THE L. U. SHEEP COMPANY", by John R. Killough, Land Use Consultant, a copy of which is enclosed. It is interesting to compare the two efforts.

The L.U. ranch area consists of about 140,000 acres within the total Grass-Crack EIS area of about 1,264,000 acres, or about 12%.

The L.U. EIS effort cost \$8,000, including the first printing. Proportionately, the BLM EIS should have cost \$67,000. Instead, it cost well beyond a million dollars.

Mr. Killough covered the range by himself, in his pickup and on foot. With his well-trained eye he observed the land, the vegetation, and the grazing habits and movements of the livestock and wildlife. On the other hand, the BLM had hundreds (70 or more) of college students with just two weeks of training, covering the range in pickups, on motor scooters, and one number with an expensive helicopter. They compiled a gigantic mass of figures which were fed through a computer with untold programming. It was easy for me to spot numerous errors in the resulting printouts, because I have some computer background. It is inconceivable to me that anyone would try to portray the living land as a set of figures.

It is noteworthy to compare Mr. Killough's background (which is found on the L. U. back cover) with the list of BLM Preservers (found on pages 112 & 113 of the BLM EIS).

The L.U. was extremely fortunate to obtain the services of John Killough, a very successful and respected BLM employee who retired and lives in Portland. He is highly intelligent, qualified, and ethical. He is a recognized authority in range management and improvement, as evidenced by his Meritorious Service Award by Rogers Morton, Secretary of the Interior. His extensive career

HEALY CENTENNIAL CELEBRATION 1880-1980 One Hundred Years of Western Livestock Ranching

included being District Manager in Maryland in the late 1960's when he became familiar with the U. S. range at that time and was able to compare it to its present condition. He had livestock management background from his three years in the management and development of a huge ranch in South Dakota. He was also But Chief of Resources in both housing and lands, as well as Chief of Soil and Watershed in Washington, D.C.

Turning to the ELM's Swearing EIS preparer you can note a lot of inexperience in most of the 15 Preparers. (most of them have a background of Wildlife Management which the preparer about 15 of the grazing. There is no preparer who has any livestock management background which represents about 85% of the grazing. This bias is evident throughout the EIS and is most evident in the Recommendations. Throughout the EIS the BLM says that they consulted with the ranchers, but a recent questionnaire to the ranchers reveals this to be almost completely false. Most little consulting was done was done after they had already made up their minds.

Mr. Killough did his EIS in two years. The BLM has taken seven years and they still are not finished. Even when, during these seven years they would not allow any range improvements, anywhere. Seven years! Frustrating, discouraging, unfair for the ranchers (and the BLM too). Now they tell us that range improvements are needed! Everyone else has known that for seven years or more.

Now let's look at the difference in the way of judging range condition and carrying capacity. Mr. Killough used the prescriptive, static, time-serving, professional, highly-accepted standard method of having a knowledgeable and experienced person look at the range, rather than having inexperienced people compile a mass of figures and statistics which are automatically calculated and then are subject to massive errors and omissions.

For illustration on page 15, Mr. Killough states, "I have been personally familiar with the rangelands in the EIS over many years. I am, as an employee of the U. S. Bureau of Land Management, I was involved in range surveys, range analysis and management of the public lands from 1948 through 1953. I had numerous occasions to examine the rangelands utilized by the U. S. Sheep Company as well as those of the neighboring ranches during this period. For examining these same lands as a private consultant. These examinations have revealed substantial improvements in range conditions throughout the ranch. While some areas have improved more than others and there are still problem areas, there have been drastic changes for the better. In the late 40's and early 50's erosion was rampant throughout the area as evidenced by numerous raw gullies.

hummocked plants and bare exposed soils between plants. Now most of the gullies have healed and many of the between are producing lush stands of grass, where it was once difficult to walk between of plants and hummocked plants. It is not possible to drive a pickup. The hummocked barren backgrounds which previously existed are now healed or healing and no new hummocks are evident, where there was no surface litter it is now generally abundant. Many desirable plant species such as winterfat were difficult to find at all, but now are common. Seed production was negligible and in many locations it appeared that reseeding would be necessary to reestablish desirable forage plants. Now seed is being produced in most areas and seedlings are evident. Forage producing plants are not just existing but are growing vigorously.....My observations cover a period of about 6 years."

On the other hand your BLM EIS uses an RCS method, as I understand it. Soil type is visually selected and a line transect is run. If the crew doesn't like the rancher's truck outcrop, sample or cilium, or through dense timber, which they determined to be in poor grazing condition. They then visually determined the species of plants and compared them to the RCS standard which is based upon a hypothetical UNMANAGED or UNUSED site situation. Any plant species which they think should be there is disregarded and omitted. What happened to the correct, accurate, and true of MULTIPLE USE, when they use UNMANAGED or UNUSED site situations as the proper standard? What are wildlife and livestock supposed to live on, not hurt?

If the crew visually declares a soil site to be one kind and it actually is another kind, then can disregard half of the vegetation, as they did with us, if they visually determine a grass species to be a different grass species, they can also disregard half of the vegetation as they did with us. I checked about a dozen line transects in the BLM office and the errors on all but one were as apparent and drastic that it was really pitiful. The crew also visually inspected the plants, visually determined their stage of growth, visually determined if they had been grazed and to what extent, clipped and weeded the plants, factored in for weather, then it was factored for average precipitation and factored for soilwater, etc. in the office. By the time everything was factored and the mistake were compounded the BLM would us with an inferior EIS.

But the pity of it all is that all of the important, time-proven accepted observations that Mr. Killough explained above, were completely ignored by the BLM. To some people figures, computations, and reports, are more important than the land itself. I have good reason to have

RESPONSE TO LETTER NO. 6

6.1 All transects were randomly selected to avoid bias. All the various range sites and condition classes were sampled by allotment.

no faith in their system.

The only reason for this BLM EIS report is to justify the soundness of huge amounts of time and money.

Mr. Killough goes on to rate each pasture condition. He rates most of our pastures as good, with some high fair and some excellent. Trend is either upward or static.

On the other hand, the BLM EIS rates our Allotments as follows:

Winter Allotment, 2604, page D-8, 75% Good, 25% Fair, "N" Category, Static Trend, Comparing Total Usable Vegetation of 2602 on page A-3 with Proposed Action on page A-7 of 3731 (Total of Livestock, Wildlife, & Wild Horses), and figuring the cut would only be on the livestock, the apparent recommendation would be a 40% CUT. This doesn't make sense.

Spring Allotment, 2603, page D-10, mostly FAIR condition, "I" Category, Static Trend, Comparing Total Usable Vegetation of 4237 on page A-3 with Proposed Action on page A-10 of 4028 Total, and figuring the cut would only be on the livestock, the apparent recommendation would be a 48% CUT. This also doesn't make sense.

A 40% CUT MEANS THAT WE ARE GRAZING 147 COWS WHERE WE SHOULD ONLY BE GRAZING 100. Absolutely!

Summer Allotment, 2605, page D-12, mostly FAIR condition (with only 11 Good), also "I" Category, mostly Undeclared Trend (can't they classify the trend when they are determining Condition?) Comparing Total Usable Vegetation of 4148 on page A-3 with Proposed Action on page A-10 of 4028 Total, and figuring the cut would only be on the livestock, the apparent recommendation would be a 43% CUT. In other words, WE ARE SKALING THREE TIMES THE LIVESTOCK THAT WE SHOULD BE SKALING. THAT IS ABSOLUTELY IMPOSSIBLE! Doesn't anyone at the BLM have enough feel for the land and for mathematics that they can spot these obvious errors?

Putting all our Allotments together BLM figures would suggest an OVERALL 50% CUT. In other words, WE ARE REMOVING TWICE THE LIVESTOCK THAT WE SHOULD, WHILE MAINTAINING A FAIR TO GOOD VEGETATION CONDITION. I shake my head in disbelief at this nonsense.

Based upon my many years of knowledge and experience with Range and Livestock Management, and Mr. Killough's excellent EIS, I again request that these three L U Sheep County Allotments be placed in the "N" Category because they meet the "N" category requirements listed on page 17.

I further request that the BLM do all of their monitoring on their own lands, and not on our State lands and private lands. I realize that the BLM has the authority to check our compliance on our State lands, but I strongly feel that they exceed their authority when they place Condition Class and Trend on land which is not theirs. Furthermore, I think that they make far too many errors.

- 6.2 All of the BLM errors are summed up and totaled on page 33. Please examine the "I" Category including the Note 27 below. Total Livestock Demand is 88,000. Cattle is 30,000, less 8000 Wildlife, and less 8000 (it is 9700 on page A-11 for Wild Horses). Leaving a net Demand for Livestock of 20,000. In other words, your figures indicate that if your "I" category are utilizing almost three times the livestock that they should according to your calculations which are based upon 50% utilization. Your figures are utterly impossible, and show no sense.

- 6.3 Since we have been discussing wildlife, let's turn to page C-18 and Note 27 which says "Numbers in () indicate 1979 Wildlife Numbers." Call them. In same document, BLM's Game and Fish Commission, told our Group of Game and Fish Commissioners that they reported the figures for the BLM. He said that the Elk and Antelope figures for 1979 would be about 1000, but that the deer figures are for 1962-1969. Since that time most of the deer in the area have disappeared, he that time most of the deer in the area would be correct today. This is a marked discrepancy in your wildlife figures, with 95% of the deer gone.

- 6.4 Mr. Killough's EIS is very easy to read and understand. On the other hand the BLM EIS is deliberately difficult to read and understand. They display far more vocabulary than understanding of the land. They deal in pounds of forage and don't indicate anything in order to add to the confusion. The language does not contain a lot of the technical use of words. The long-standing definition of the word "demand" is changed in this book. Preference is given to use of the word "demand". The word "use" includes active non-use but does not include unneeded non-use, and so on.

- 6.5 Now let's deal strictly with the BLM EIS. The Management Framework Plan Recommendations on pages 6 through 13 were designed not to give the livestock and wildlife top priority and disregard livestock needs. The fence recommended by the BLM is not in line with the spirit of the Montana State laws. Every recommendation shows no thought from the rancher's point of view. The fence will not hold sheep, and the cattle fence will not hold cattle in many areas. The recommendations are designed in concert with no regard for the rancher and the livestock. Consultation to the BLM means spent money with the

6.2 Supply figures came from preliminary outputs from SVIM inventory and were used to compare various alternatives in the DEIS. Monitoring data including actual use, precipitation, utilization, and long-term trend will be used in making any adjustments in livestock use.

6.3 See Response 4.5.

6.4 We made an effort to keep the analysis to pounds of vegetation due to the differences in animal requirements which makes it confusing to try to compare wildlife AUMs to livestock or horse AUMs. The economic analysis required using AUMs for livestock income impacts. We used accepted BLM terms and tried to footnote for explanation.

6.5 All fences on public land must meet multiple use standards which includes not restricting wildlife movement. The design is standard throughout public lands in the West and has been used for many years.

ELM to reach a decision, and then dictating to the rancher what it will be, while threatening him with everything possible to make him do it.

There are so many unimpeachable and dictatorial decisions throughout that it is impossible to note them all. For example, on page 25, the RLM talks about "Order will be maintained" and "no grazing occurs prior to seed rise or new sprouts but users out of them. Grazing would not be allowed prior to seed rise or new sprouts until the grazing system is developed and all necessary facilities installed." Since the RLM contentiously says that they have no money, this is an obvious attempt to kill the livestock and drive the ranchers off the range. It just argues this while practically improving the range, but the RLM will not listen.

On page 26, Prescribed Range Management for the Proposed Action "If Category Allotments are put spring and summer allotments, DMS and DMS. These allotments are listed for change in future consumption which I have previously dealt with, these are also listed for periods of no grazing for one or more years so different pastures which is rest-rotation. I discussed this last March with Gus Horsey and we both agreed that there was no way to accomplish this in such an area. But I agree the local RLM knows more about it than Gus Horsey, and I do.

The Proposed Action indicates that we have no need for fences or receivers, which is untrue. It indicates that we need no fences in DMS, which brings up a more recent. I entered a lot of time for fences which I had planned several years ago, and which were approved by the RLM. I didn't get them installed because of lack of help and money. Several months ago the District Manager told me that the approval and agreement was not valid and was no longer in effect. I strongly object to the RLM entering into an agreement and then reneging it at their whim.

The Proposed Action indicates that both Allotments have been spraying prescribed for them. This is another more point. Most of the RLM's in this area are too slow for spraying for watershed protection. I have already sprayed much of the District and decided lands since I don't know, so I don't need to be told about it. And the last seven years I asked to spray a small amount of vegetation on the RLM and the RLM refused. Now they fault me for having vegetation that needs spraying.

12 or 15 years ago the RLM and the LW jointly sprayed vegetation under RLM DMS contract, and supervision. Was a lousy job of spraying, with very poor supervision and bill. I never again want to join with them in their

erasing the aspenbrush while we pay part of the costs.

On pages 76 & 77, 2-4-0 spraying seems all negative. There are guesses that are enhanced by the spraying.

On page 124 you will note that our Allotment DMS has Wild Horses. They have been an ever-increasing problem. One summer they striped off our sheep winter range so badly, including damaged and State lands, that we were forced to buy a lot of hay to winter our sheep. We can't raise our grazing and protect the land with these horses around.

For 15 years I have been trying to get the RLM to let me give part of our Allotment to the wild horses for their benefit and protection, and let me fence it off from our allotment and lands for their protection. I have had no luck. The RLM notoriously allow the wild horses to abuse the land, but they would drive me to allow if I did it.

Now the RLM is suggesting that we fence off part of our sheep range so that both the sheep and the wild horses will share it, nothing doing. Our sheep will kill the horses for the abuse to the range by the wild horses, as we have done in this present RLM EIS.

It makes much more sense to me that our ranch with adjoining ranches give part of our Allotments for the benefit of the wild horses, then fence it so that the horses will have their range protection, and then attack it with proper wild horse number so that the land will be protected too. The area which I have been suggesting for so many years is very picturesque and beautiful. For many years the horses have felt at home there. It would be a beautiful setting for people to view the horses from above and at the end of a road. So far I have had no success or encouragement from the RLM. The RLM treated upon means the area a wilderness area with no provision for maintaining the resource factor that the horses depend upon. I do agree with them that the wild horses should be reduced and maintained at a sustainable level.

I also agree with them on page 105 where they say "Likewise the proposed action (the proposed range management policy) would be seen as another instance of decision making by government officials who fail to understand the effects on local range users. This would intensify negative attitudes toward the Federal government and contribute to an already existing alienation and frustration with government." Now You!

I do disagree with page 105 and the "Effect on Ranch Values". It would be much worse than they say. Overall, the figures in this book, R, G, F, G, categories would indicate about a 50% GRABING OUT, and a complete disruption of wildlife pattern and season of use, dictated by a bunch

of BLM shutouts who continually talk about cuts and about putting a lot of small ranchers out business. Such grazing cuts and shutouts could easily reduce ranch valuations by 50%. Ranches right now are suffering severe operating losses. If a rancher owns 50% of his operation, and any of these do, and his ranch valuation drops 50%, he will be forced to liquidate and lose his life's savings. We know this but they keep right on going in.

The landing agencies are no longer losing on ranch lands around here.

- 6.6 Some place in this EIS it states that only 50 people are employed full time on the 16 ranches in the Green Creek area. This is itself a ridiculous. Have they ever heard how hard ranch wives and their children work?

In page 109 the EIS states, "During and following the BLM inventory process, individual ranchers were consulted by BLM staff members and opportunities in their statements, updating of allotment files and determining grazing suitability." This is almost completely false.

- 6.7 The BLM conducted these studies in absolute secrecy; reminiscent of Watergate. They did release the final results of their studies to those ranchers last summer who called a massive meeting to alarm the ranchers and the public. At this same meeting the District Manager told everyone there that there was a change of direction to categorization, and that the figures could be put back in secret files and not be used without the ranchers' permission. Meanwhile, the BLM staff continued to work with these figures in complete secrecy and they are now published in this BLM EIS. All the ranchers blame all the Worldland BLM staff for this atrocity; this means this deception, this falsehood, this lack of integrity, and this Watergate cover-up.

Now the BLM says, "Trust us." We want to be good neighbors."

I hold their standards in contempt.

Yours truly,

Donald S. Healy
Donald S. Healy/Pres.
L. U. Sheep Company

Public Involvement

June 3, 1982

John Moorhouse
Bureau of Land Management
Box 119
Worland, WY 82401

Dear John,

I am writing in regard to the Grazing Draft Environmental Impact Statement.

- 7.1 First of all, the statements in the Draft are misleading. Instead of public input before the fact, it is all done after the fact. In my first meeting with James Legg on July 20, 1981 with my brother Gabe Legg in attendance, Mr. Legg stated after questioning that this is the way it was going to be whether the public likes it or not. My comment to that statement is that while Mr. Legg seems to be working for the land only, as a working for the people of Wyoming as well as the entire country and will do all within my power to stop the adoption of this statement whether with the US error and/or our Congressional delegation.

The statistics used in this draft come from computers without any input from the ranchers who are the ones on the land itself. No complete on site study was done.

If this Draft is adopted, it will adversely affect the livestock industry which will directly affect the economy of the State, the counties and municipalities with a significant loss of revenues.

I strongly urge you not to adopt this statement.

Sincerely,

Ben Carroll E. Geis
Ben Carroll E. Geis
Cc. BLM State Office



6.6 See Text Revision page 69. This has been revised to reflect the full-time equivalent (FTE) employment associated with livestock grazing/production on allotments where BLM authorizes livestock use. This revision includes employment associated with BLM authorized grazing on private and state land as well as that on public lands. It does not account for employment associated with livestock grazing/production on private or state lands not authorized by BLM.

The method of estimating employment was similar to that used by Lewis and Taylor, 1977 (Impacts of Public Lands Policies on the Livestock Industry and Adjacent Communities, Big Horn County, Wyoming) where "an FTE is defined as 2,000 man hours per year with 10.5 man hours required per animal unit (AU), per year on the 'average' livestock ranch;" thus for approximately every 190 AU change there will be one FTE change in the livestock industry. This method is useful to display the general employment impacts to the agriculture sector of the local economy and it does include large amounts of family labor; however, it is used only to estimate employment associated with livestock grazing/production authorized by BLM. That is why the number of FTEs is less than the number of operators.

6.7 Page 109 of the Draft EIS summarizes the public involvement effort that was made during the planning and EIS preparation process. The documentation of this effort is much too voluminous to print in this EIS, but it is available for public review at the Worland District Office.

RESPONSE TO LETTER NO. 7

7.1 See Response 6.7.



U.S. GOVERNMENT PRINTING OFFICE
1969-00-000000
100-10-10

United States Department of the Interior

NATIONAL PARK SERVICE
NICKY B. HARTMAN, Director
100 Park Road
Fort Collins, Colorado 80521

8



JUN 4 1982

Memorandum

To: Dean Lander, Forest of Land Management, Worland, Wyoming
From: Associate Regional Director, Planning and Resource Conservation
Subject: Review of Green Creek Grazing Draft Environmental Impact Statement, Big Horn, Hot Springs, Park and National Cemetery, Wyoming (BIS 02-14)

This is in response to your request for our comments on the Green Creek Grazing Draft Environmental Impact Statement.

We note on page 68 that approximately 250 public lands sites have been recorded in the Green Creek Grazing area. We will be sites which are potentially eligible for the National Register of Historic Places. While page 101 states that the proposed action will help reduce erosion and sampling, there will appear to be potential for damage to prehistoric and historic sites. We recommend that the National Historic Preservation Officer (NHPO) be consulted on a regular basis and be given an opportunity to comment on site-specific actions to be taken under the proposed action. The NHPO for Wyoming is Mr. Jon S. Wilson, Director, Wyoming Heritage Foundation, 604 East 28th Street, Cheyenne, Wyoming 82001.

The National Historic Preservation Act, which is within the boundaries of the Green Creek Grazing area as shown on the map on page 67, has required submitting each site to the Land and Water Conservation Fund (LWCF). Areas receiving such assistance are subject, in their entirety, to the provisions of Section 101 of the LWCF Act of 1965, as amended. This section provides that any change from outdoor recreation use as approved by the Secretary of the Interior. While we do not participate with the proposed action in any of the alternatives would involve such a change, we believe that this should be made of the provisions of Section 101.

We hope you will find these comments useful in your planning process. If we can be of further assistance in reviewing subsequent aspects of the proposed action, please do not hesitate to call upon this office.

[Signature]
Richard A. Smith

Very truly,
Yours

BOARD OF TRUSTEES

DAVID A. BULLOCK
JAMES A. WILSON
JAMES A. WILSON
JAMES A. WILSON
JAMES A. WILSON

LESLIE B. BARNES
LESLIE B. BARNES

LESLIE B. BARNES
LESLIE B. BARNES

WFOA!

WILD HORSE ORGANIZED ASSISTANCE

A Foundation for the Welfare of Wild Free Ranging Horses and Ponies

9

P. O. Box 101
New York, NY 10001
Phone: 212-696-1001
Fax: 212-696-1001



Dear Mr. Monahan,

WFOA is not included in the organizations on the Consultation and Coordination List. Please add our organization to your list.

Sincerely,

Kathryn Anderson
WFOA



RESPONSES TO LETTER 10

10.1 Refer to Page D-21 for literature references for utilization limits.

10.2 See text revision page 33, Table 1-7.

10.3 See response 4.2.

10.4 See text revision Table A2, page A-11.

10.5 Table A2 includes only land within the allotment boundary. It does not allow for wildlife use on private lands outside of BLM allotments, which generally includes hayfields along the creek bottoms. Game moving back and forth between BLM allotments and private hay meadows are not included.

10.6 See text revision page 22 Table 1-3.

10		RECEIVED JUN 7 '82 BUREAU OF LAND MANAGEMENT
HOT SPRINGS COUNTY RANGE AND LIVESTOCK BOARD		
cc Kirk Nelson Route 2 Woodland, Wyoming 82401		Telephone: 347-6307 June 7, 1982
Bureau of Land Management c/o Dept. of Agriculture Box 119 Vernon, WY, 82450		
Dear Sir:		
Re: Grass Creek Grazing Draft Environmental Impact Statement		
Comments:		
10.1	Table 1-5	Livestock present utilization with grazing management to 516 on my species. Other districts allow 400 utilization. Why isn't this uniform?
10.2	Table 1-7	Architectural error in communication.
Appendix A		
	Table 11	Table 1-7 states that for the proposed action, it is assumed that supply is equal to demand in all "W" and "C" category allotments.
10.3		A random sampling of "W" category allotments indicates the demand is greater than supply. Why?
10.4	Table 12	Table 12 differs on forage demand for wild horses (W/H) as compared to (H/W) in "C" category allotments in Table 1-7.
10.5		Does Table 12 allow for forage consumed by wildlife on the private lands, primarily the alfalfa fields and meadows on the creek bottoms?
10.6	Table 1-3	The allotments are not listed that are in the "C" category, such as South Creek and "H/W" BLM. (H/W) is within BLM and should be back listed as shown in Table 12.
Sincerely yours, Kirk Nelson Kirk Nelson		

RESPONSE TO LETTER NO. 11

11.1 See response 6.5.

11.2 See response 4.5.

11.3 See response 10.5.

11.4 The BLM does not manage wildlife, only wildlife habitat. The Grass Creek planning system recommends that habitat be provided for wildlife called for in the Wyoming Game and Fish Department strategic plan.

11		RECEIVED JUN 7 '82 BUREAU OF LAND MANAGEMENT
HOT SPRINGS COUNTY RANGE AND LIVESTOCK BOARD		
cc Kirk Nelson Route 2 Woodland, Wyoming 82401		Telephone: 347-6307 June 7, 1982
Re: John Hagerhouse, Team Leader, Bureau of Land Management, Box 119, Vernonia, Wyoming 82401		
Dear Sir:		
The following are comments by the Hot Springs Range and Livestock Board on the Grass Creek Draft Grazing Environmental Impact Statement:		
11.1	1.	This document is extremely hard for the average person to read and understand. For example, on one page you deal in "W/H" and the next page you deal in thousands of pounds of forage. Why is this necessary?
	2.	You have had about seven years to prepare this document. It is very difficult for the non-technical and the public to make intelligent and comprehensive comments in the comparatively short time of 45 days. We feel additional comments should be accepted and given consideration as the complex ramifications of the EIS are realized.
	3.	We as a Board recently conducted a survey of the Hot Springs County ranchers operating within this EIS area. Our findings indicate the following:
	(1)	That the consultation by the BLM with the rancher was a one-way street—it appeared that the BLM already had their minds made up prior to any visit.
	(2)	There was little or no input from the ranchers on wildlife numbers, range improvements, climatic conditions, categorization of the individual ranchers' allotments, and livestock numbers and movement patterns.
11.2	4.	Under Appendix "C" the numbers in parentheses indicate 1979 wildlife numbers. The Wyoming Game and Fish Commission's Big Game Biologist stated figures for deer were taken from the 1943-1945 count. Please explain.


5. As representatives of the Hot Springs County ranchers we are alarmed at your extremely low estimate of Total Usable Vegetation and its possibly drastic effect on our ranchers. Furthermore, many parties contend with the management framework recommendations such as spring turn-out dates, not grazing until after September 15th, utilization when it is higher in other BLM Districts, etc. The cumulative economic effect could be a disaster to many ranchers. Please comment on this.
- 11.3 6. Was any consideration given to the amount of forage consumed by wildlife from the alfalfa fields and meadows on the creek ranches?
- 11.4 7. Is the BLM exercising their authority when their intent is to terminate wildlife ranchers on allotments which contain desired lands, to the detriment of the livestock grazing?
- 11.5 8. The Economic Impact on page 5-2 and the Livestock Operating Budgets in Appendix "1" are completely erroneous and misleading for the Grass Creek Area. There was no presentation of the debt load on the ranches and what the impact could be on ranchers who are over-loaded with debt. Our Board is vitally concerned with the economic well-being of every Grass Creek rancher, whether large or small. Please comment on the source and the reliability of your economic information.

Yours truly,

 Don Campbell, Chairman

11.5 The data contained in Appendix I is based on production assumptions, prices, and costs that were reviewed by the livestock producers in the Grass Creek Resource Area and modified in response to suggestions sent to Kerry Gee, USDA Economics Statistics Service. The potential consequences of assuming additional debts are described on page 69 in the section entitled "Financial Viability of Ranch Enterprises." An individual's ability to pay interest and principle on a new debt is estimated in terms of "returns above cash costs." This is displayed for the representative ranch budgets in Appendix I. For estimates on how grazing permit changes could affect ranch values, net returns, and ranch financial positions see the Colorado State University Experiment Station Bulletin 5835 entitled "Effects of Reductions in Federal Grazing Permits on Sheep Ranch Value and Borrowing Capacity." This analysis found that reductions in grazing permits have a significant impact on ranch capital value, and in each of the case study ranches, all loan factors, which include ranch value, loan to appraisal value ratio, debt to asset ratio and repayment ability were adversely affected by permit reductions.

- John Moorhouse, Team Leader
 Bureau of Land Management
 Box 119, Worland, Wyoming
- RECEIVED
 JUN 8 1982
 JUN 7 1982
- SUBJECT: Grass Creek Grazing Environmental Impact Statement
 I feel the Draft for the Grass Creek Resource Area is inadequate because:
- 12.1 1. Non-Game Species are not considered in any Management Plans.
- 12.2 2. Tables 1 - 2 pages 17 through 20 do not address wildlife objectives. Page 21 should be a must as wildlife is supposed to be given equal consideration to the other resource uses.
- 12.3 3. Tables 3-9 through 3-14 starting with page 30, waterfowl and trout are not included. Page 31 feel this is a must in any Environmental Impact Statement.
4. I feel this Plan falls far short in Wetlands Zone Management for Category M and C.
5. This Draft does not meet Ours and Fish Goals on M and C Categories.
- 12.4 6. Grazed wildlife winter range is not being addressed in W and C Categories. It does not matter how much feed you have on summer ranges if the wildlife cannot live through the winter, there will be no wildlife to use these summer ranges.
7. I think Alternative #4 should be applied to M, T, and C Categories as this is the only alternative that takes a balance approach to all uses of Public Land in the Grass Creek Area.
8. In the South Fork of Owl Creek Basin and Rock Creek Range there is a sharp decline of wildlife that used to range there in the 1960's and 1970's. One main reason for the decline of wildlife in this area was caused by overgrazing. I feel this Draft falls far short in addressing this wildlife problem.
9. There is a critical need for public access to upper Owl Creek. I feel critical public access needs should be addressed in any Grass Creek Resource Area Plan.

Sincerely,

 Allen L. Schweigert
 100 Trappanant Lane
 Thermopolis, Wyoming 82430

RESPONSE TO LETTER 12

- 12.1 See response 1.1.
- 12.2 Wildlife needs are included in the multiple use objectives.
- 12.3 See text revisions for tables 3-9, 3-11, 3-12, 3-13 and 3-14.
- 12.4 See response 3.2.

RESPONSE TO LETTER 13

13



Del Creek Ranch, Box 11
Thermopolis, Wyoming 82443
June 4, 1982

To: Bureau of Land Management
ATTN: John Mouton, Team Leader
P.O. Box 116
Natrona, Wyoming 82401

Gentlemen:

Please accept this letter as my comments to your Grass Creek Grazing
E.I.S. draft.

Sincerely,

[Signature]
J. J. Campbell
President, Campbell Inc.

I will
comment on
Grass Creek Grazing E.I.S.

13.1 Page 31 of the DEIS details the procedures that would be used to make changes in livestock numbers. The projected changes were derived from preliminary SVIM inventory data for analysis purposes. The basic assumptions for the long-term environmental consequences are listed in Chapter 3, page 71.

13.2 The Federal Grazing Regulations require the vegetation resources on Public Lands be allocated among livestock grazing, wild free-roaming horses and burros, wildlife, and other uses in the land use plans. Worland District policy is to use the Wyoming Game and Fish Department Strategic Plan to establish the wildlife population goals for which the BLM provides the habitat on Public Lands.

13.3 Appendix B, Table B2, page B7 shows 14 percent private lands in the "I" category.

13.4 We are well aware of the potential impacts that grazing reductions could have on an individual's ranch value, net returns and ranch financial position especially in light of current economic conditions. The financial impact of grazing reductions would depend on the characteristics of the ranch and the management ability of the operator. However we do not know how many or which ranches you would consider "marginal." This is confidential information between a rancher and his lending institution.

13.5 We already have operators who do not live on their base properties and some of these have large livestock operations on public land. Changes to the local economy, access to public land, and recreation opportunities are probably not a function of an operator's wealth or residence.

COMMENTS ON GRASS CREEK GRAZING ENVIRONMENTAL STATEMENT

- I. Page 2-3 - Long Term Environmental Consequence - paragraph Livestock Grazing Alternatives 1, 2, 3, and 4 state changes in livestock numbers.
 - (a) What is the projected change under the proposed action?
 - (b) How is this figure arrived at if future monitoring is to be used to determine stocking rates?
 - (c) Unless you have already determined when the stocking rates will be, what's the final stocking rate after all the other "long-term Environmental Consequences"? Please explain.
- II. By what authority can you increase wildlife use on allotments with a majority of private and state lands, while at the same time reducing domestic livestock use?
- III. You have made some very inadequate assessments of user's dependence on BLM, grazing permits, the economic effect on the permittee and to the local communities. Some questions that come to mind are:
 - (a) What percentage of the private lands are used in conjunction with BLM lands and therefore subject to adjustments in livestock use?
 - (b) How many livestock operations are now marginal due to size, debt load or other uncontrollable factors that would be forced into liquidation by even a small decrease in livestock grazing?
 - (c) What effect would a few wealthy absentee owners controlling most of the Grass Creek Apns have on the local economy, the access to the federal lands and the recreation in the area?
- IV. Several discrepancies are apparent on allotments of Campbell Inc. and Del Creek Cattle. I will try to address them individually.

COMMENTS ON GRASSY OPEN SPACE ENVIRONMENTAL IMPACT STATEMENT

1. Bridge 0540, Table B1, Page B-2.

13.6 a. Acrespace within the actual boundaries are not the same as owned and allotted and shown in the table.

b. The private A.U.M.s and total demand figures are wrong and I have been assured they will be corrected.

c. Table A2, Page A-4 should be corrected to reflect the total demand in (b) above.

13.7 d. In the 15 years my family has used this allotment, there has only been an occasional antelope seen on the place. I know the exposed crown in 1979 is completely wrong. There are not 11 to 15 head of antelope on the Bridge 0540 Place.

13.8 a. Your total usable vegetation figure in table A1 is way too low. In 1981 I grazed 500 AUMs and harvested 180,000 pounds of hay. This doesn't fit the 104,000 \$ of usable vegetation your table shows.

b. There's Peak 0541.

13.9 c. Table B1, Page B-4. Number of deer antelope are not listed. Private AUMs and total demand are wrong as previously reported. Table A1 Page A-4 should be changed to reflect the change in total demand.

13.10 b. The projected and supposedly 1979 deer count is much higher than I have observed in 10 years of grazing and hunting this allotment.

13.11 c. Total usable vegetation in Table A-1 is ridiculously low at 84,000 \$ especially with your game demand at 95,000\$.

d. This allotment should be in the "M" category because of the small amount and small percentage of A.U.M. use. Due to the inaccessibility by cattle to much of the A.U.M. lands, there is very little conflict with game and very little so-called "grazing damage" to the federal lands. This area should be used as I have used it in the past, in a pasture rotation system with my stippling forest plant.

2

13.6 See text revision Appendix A and B.

13.7 We have wildlife actual use data for the past 10 years, with more intensive information since 1979. Future monitoring efforts should either confirm or refute the actual use and habitat potential situation. This allotment (#0540) is in the "M" category where no use adjustments would be likely.

13.8 See Text Revision, page D-18, Appendix D. Hay harvested from private lands is not included in the usable vegetation calculation.

13.9 See text revisions Appendix A and B.

13.10 See response 13.7.

13.11 See Text Revision, page D-18, Appendix D.

13.12 See text revisions Appendix A and B.

13.13 See response 13.7.

13.14 Data on allotment 0575 is correct according to our adjudication files.

COMMENTS ON GRASSY OPEN SPACE ENVIRONMENTAL IMPACT STATEMENT

a. Table 1-4 Page 28 - Prescribed Management. Grazing combination I would better fit my grazing needs instead of Combination 1. I have a lot of acreage that need or could be developed.

3. South Creek 0541.

13.12 a. Table B-2, Page B-5 - Private AUM and total demand figures were wrong.

b. Table A-2, Page A-2 - Total usable vegetation figure very low at only 10% of total production.

13.13 c. Cooperative game count on this allotment in 1979 Appendix C, Page C-1 is a fairly late. This area is very open with almost no plants for game to hide. 1979 was a very dry year with the feed used fully by August 1. Range surveys were being conducted. Even if there normally were (and there is not) this much game in this allotment, they would have moved out and could not have been counted throughout the year. An unused wilderness forest permit lies to the east of this allotment.

4. Owl Creek 0575.

13.14 a. Total demand should be 841 AUMs not 851. Table A2 Page A-10 should also be corrected.

b. Total usable vegetation Table A-1 is too low.

c. Other prescribed range management Table 1-4 Page 28 combination 1 is totally unsuitable. The production land area and grazing use is on private lands and I feel you are not justified in this action. Fencing into pastures would have to be done and should be at government expense if government directed.

3

CONSENT TO GRASS CREEK GRASSING ENVIRONMENTAL IMPACT STATEMENT

5. Haystack 0077.

a. It was my understanding that this allotment was to be placed in the "H" category if it was used in the fall and winter. I agreed to this same of use.

b. Proposed Management Practices are unnecessary if the above category is corrected. Change in Forage Consumption and Consumption 1 is unacceptable.

c. Forage Production Figures are again too low. After three years use by Old Creek Cattle at the present demand level, with fall use, feed production has increased.

d. Owl Deer 0074.

e. This allotment has been used at the "total demand" of 1142 AUMs for the past three years with very ample feed left each year. The forage condition trend, according to your survey is acceptable therefore I say the 618 AUMs of total waste vegetation calculated from Table A-1, Page A-2 is incorrect.

V. The Grass Creek Grazing Environmental Impact Statement is very biased in its content. It is slanted very strongly against the practice of livestock grazing. All negative remarks associated with livestock grazing are emphasized and the positive aspects are mentioned briefly or ignored. No mention is made of the many thousands of pounds of feed that wildlife receive from private fields and haystacks, yet the effect on wildlife of any grazing practice is acknowledged completely. Big game numbers fluctuated in years past with livestock numbers higher than presently. Factors other than feed supply have been major in the decline of big game animals.

4

13.15 See Text Revision, page D-18, Appendix D. If the situation changes on the allotment, the category can also be changed.

13.16 The data are preliminary and have not been field checked. The forage requirement for winter cattle is 550 lbs. per AUM instead of 780 lbs. used. Any adjustments in livestock use will be made as the result of monitoring data.

CONSENT TO GRASS CREEK GRASSING ENVIRONMENTAL IMPACT STATEMENT

Lands of Campbell Inc. and the attached RMA grazing permits have been used under the same general management and livestock use for the past 35 years. Improvement of the range resources have taken place. Range management practices have been adapted when practical and affordable.

The overgrazing and future management practices proposed on private and state lands are very detrimental and unnecessary in many instances. Many of these management practices will be very costly and disruptive to the livestock operations. The projected results of increased livestock weights, less sickness, range class improvement, less erosion and more wildlife production are based to a large degree on theory and may never be achieved.

I believe alternative number 1 should be adopted for the Grass Creek Area. With our combined resources available used for education, cooperation and management practices applied to the most critical areas, the needs of the land, the public, the rancher and the sportsman can be better met.

Sincerely,

W. J. Campbell
W. J. Campbell,
Campbell Inc.,
Old Creek Cattle Company



Thompson's, Wyo
June 6, 1982

14

John Macchiusi
Team Leader, Bureau of Land Management
Windland, Wyo

Dear Sir:

Having studied your "Hess Co. Grazing Draft" I would like to make the following observations-

In my opinion, anyone who is not a horse-fish livestock operator, would find Alternative #4 the only logical choice, no doubt with some modifications. Alternative #4 addresses the importance of having at least some fence for big game animals on their critical winter range. In table 1-15 of your Management Needs Work Plan for #4, W-5.2 and W-5.3 are especially important. Big game and all forms of wildlife certainly deserve high priority on their important habitat area. Your Management Needs Work Plan for #4 would definitely go a long ways toward correcting the mistakes of that year.

According to the study, only approx. 5% of the forage was in much of the area in question, so was wildlife. In the past, more wildlife has really received a meager share of the pie. Its high time for some change.

Recognition of the importance of west land is long overdue. On any range they are perhaps the most important factor. Because the bulk of the stream bottom are in really deplorable condition, I certainly don't feel this is any reason not to put forth a real effort to stop or slow the deterioration.

For sure the adoption of Alternative #4 alone in part, will be extremely unpopular with many livestock operators. In spite of this, the time has come to give range and Wildlife a fighting chance. The general public has a very large stake in this and also B. N. M. land area.

I have seen a livestock operator as well as a member of Wyoming wildlife management team many, many years. In my conversation with the problem faced by the livestock people that there should be a middle ground where both of these interests

Respectfully
Donald H. Martin

Box 661
Thompson's, Wyoming 82442

THE UNIVERSITY OF WYOMING

DIVISION OF RANGE MANAGEMENT
Barnes Building, Box 218
Laramie, Wyoming 82001

COLLEGE OF AGRICULTURE AND AGRICULTURAL EXPERIMENT STATION

June 8, 1982



15

Telephone: (307) 766-6200

Mr. John Moorhouse, Team Leader
Grass Creek Grazing EIS Team
1801, Bureau of Land Management
P. O. Box 119
Nederland, WY 82401

Dear John:

This is a joint comment on the Grass Creek Draft Environmental Impact Statement on Livestock Grazing by Drs. Don Rodgers and Tom Ruddy. We must emphasize that these comments are our own. These comments should not be interpreted as representing the University of Wyoming, the College of Agriculture, or the Division of Range Management. Our comments reflect our understanding of the Grass Creek area, its resources, the people involved in this EIS, and resource-people management problems and opportunities. This understanding is based on visits with ranchers and agency personnel, field tours, and study of the draft EIS. We have this view of our comments shared publicly, but we admit that we do not know as much about the Grass Creek area as you, your team members, and the range users. We offer our comments as an attempt to make the Bureau, concerned ranchers, and others in solving the resource management problems. We will be happy to visit with you personally about any of these comments.

The proposed action appears to be a reasonable and feasible alternative. We use the term "appears" because the draft EIS omits some data that we think is needed to properly understand the problems the draft EIS is

Please printing statements, suggestions, or notes in progress of the University of Wyoming shall be considered equally without regard to any, value, national origin, sex, religion, political belief or handicap.

Mr. John Moorhouse
Grass Creek EIS

June 8, 1982
Page 2

designed to address and the proposed action should solve. Specifically, we would like to have the final EIS include the following additional information:

15.1

15.2

1. What are the signs of less than desirable or unacceptable range condition? Most of the current range problems seem to have been identified through range condition analysis. We agree that range condition information provides useful information. However, we think that such information is more useful when it is combined with an assessment of why a certain range condition exists. An area may be in low fair condition with a mastic trend because of overgrazing that occurred many years in the past. This overgrazing allowed a species such as sagebrush, greasewood, juniper, cheatgrass, or blue grass to increase and dominate the site for many years after the overgrazing problem has been solved. In other words, current livestock grazing is not necessarily the cause of range condition problems we see today. We hope your final EIS will provide sufficient information on why unsatisfactory range conditions exist so the reader may judge whether your proposed management will solve the problems.

2. What are the currently used livestock management practices that are causing range degradation or preventing range improvement? The draft EIS mentions in several places (i. e., Alternative 1) contains the present grazing management is not acceptable that current livestock management practices are not "fitting the job done". None of the unacceptable practices are listed in (i. e.,

RESPONSE TO LETTER NO. 15

15.1 The purpose of an EIS is to present the future impacts of all the reasonable alternatives available to the decision maker, not to provide extensive historical data. In fact, the CEQ regulations require us to reduce emphasis on background material (1500.4). One can only speculate why the allotments are in the present conditions but some of the historical grazing use and associated management problems are discussed in the Grass Creek planning documents and were used to make impact predictions in the EIS. These planning documents are available in the Worland BLM Office.

15.2 Refer to proposed action for livestock management practices that need to be changed for range improvement.

it is assumed that present milking practices are unworkable to the BLM because a change in milking practices is mandated in the RMP recommendations (page 15, at 5.2.4.4), but a list of all activities the Bureau would like to see changed would be helpful to the reader. We suggest that such a list would assist the ranchers in assessing what they can do to help the BLM improve range management in the Grass Creek area.

15.3

3. What is the multiple use situation (range) of the Grass Creek area?

The draft EIS leaves the impression that data that satisfactory range conditions and declining trends are due to domestic livestock grazing—~~only~~. We realize that this is a growing EIS, but we encourage you to provide a table in the final EIS that outlines changes that have occurred in many of the uses covered by the Grass Creek area during the past 20 years. For instance, we would like for this table to include changes that have occurred in cattle, sheep, wilding, elk, and wild deer (WMA) and in sage grouse numbers; changes that have occurred in the season of use of any of these animals; and changes that have occurred in recreational use—particularly in use by off-road-drive vehicles. We recommend that the table present the data in five year increments (i. e., 1960, 1965, 1970, 1975, and 1980). Such a table will allow the EIS reader to properly assess which uses contribute to changes in range condition and trend. Finally, we think such a table will indicate that livestock use has been fairly stable during the 1960 to 1980 time period, while other

15.3 Domestic livestock have been in the past and continue to be the primary forage consumer in Grass Creek area. Long-term trends in wildlife populations wild horse numbers and recreational use in the EIS area can be found in the Grass Creek Unit Resource Analysis (URA). It is doubtful that a 20-year time period would give a meaningful picture of these trends or the relationship of other uses to these trends.

uses have increased. Such a finding may require you to reevaluate your need to manage livestock differently, or to give different reasons for recommending management changes (i. e., livestock may have to be reduced because the public wants more wildlife, but not because livestock are causing range decline or brand problems).

15.4

We have previously expressed our concern to the Bureau about the Computerized Forage Allocation Process used in the draft EIS to ascertain the "difference" between current forage supply and forage demand. It is our advice that proper use factors and allowable use factors used in the computerized process were too conservative, and because of this only 11.4% percent of the estimated total plant production was allocated to livestock, wildlife, and free-ranging horses. Allocation to these three large herbivores range from 3 (deer) percent for three allotments (2075, 2115, and 2033) to 11% percent for allotment 666. Ignoring these extremes, we must allotments 10 to 15 percent of the forage was deemed usable by large herbivores. These extremely low allotments of usable forage cause serious shortages of forage to appear in all tables comparing forage demand and supply. We are convinced that these shortages do not actually exist, but are an artifact of the computer system. Unfortunately, the shortages reported in the draft EIS will add fuel to the fire about how livestock overuse the range (note that the total forage demand includes wildlife and wild horses in addition to livestock) and compete with wildlife for forage. We encourage you to clarify data in the final EIS about the forage production data given in the draft EIS is based on a use

15.4 Refer to Appendix A and Table 3-10, page 92. See Response 2.5.

15.5 As indicated on page 31 of the DEIS and the summary description of the proposed action in this document, the forage production data are preliminary and would be supplemented by monitoring.

line survey and comparison by a computerized model that has not had its predicted results tested against a field situation. Given the impact that such data can have on people's lives, it is imperative that the computerized data not be used in any way to help make management decisions until the computerized allocation process has been proven through field testing.

We are familiar with and supportive of the allotment categorization process that has been used to classify the allotments into the "M" (maintain present conditions and management), "I" (improve present conditions, resolve use conflicts, or improve management), and "C" (use allotment management as leads that the Bureau is unable to adequately monitor or which is ecologically unable to respond to management) categories. This process will allow BLM to establish priorities for allotments which need attention now versus those allotments which do not need immediate attention. Because of the importance of this categorization process, we offer the following comments:

1. "M" Category Allotments (page 17)
 - a. Item 8 under Characteristics should read "ecological potential" rather than "potential" (this suggestion also relates to all other parts of the draft EIS where the concept of potential range condition is used).
 - b. We fully support the idea expressed in item 8 under Category Criteria. We agree that on many range sites fair condition is acceptable--particularly if the trend shows improvement.
 - c. We agree with your stated management objective. We encourage you to broaden this objective, however, to include resource

conditions (i. e., we suggest a statement such as, "A second objective is to manage all multiple uses so that resource conflicts do not develop"). Wildlife numbers or recreational use should not be allowed to build up in the future so that "M" Category Allotments must be changed to "I".

15.6

15.7

- a. We would like clarification on the use of the word "Range Improvements". Range Improvements are specifically defined as fences, water, springs, troughs, roads, and corrugations on page 19, while plant treatments are identified as sagebrush seeding, prescribed burning, rotary brush cutting, and blue gram seeding on the same page. Table 1-4 (pages 14-17) seems to list "Range Improvements" and "Plant Treatments" as totally different activities. If this is so, then "Plant Treatments" must be addressed under Item C of the Management Actions (page 17). Otherwise, your definitions will prevent any plant treatments from being done (i. e., Item C now reads, "RANGE IMPROVEMENTS will be authorized if they meet management objectives").
2. "I" Category Allotments (page 18)
 - a. Item C under Characteristics should read "ecological potential".
 - b. All emphasis seems to be placed on resolving conflicts caused by livestock. What actions will be taken to resolve conflicts caused by other uses? We encourage you to broaden your Management Objective Statement to address solving resource use conflicts.
 - c. See comment "d" above concerning use of the term range improvements.

15.6 Wildlife numbers will be allowed to fill, but not exceed, habitat to the G&F strategic plan goals in accordance with MFP recommendation WL 4.1. The G&F strategic plan goals on "M" category allotments will not create a significant resource conflict, as defined by the "M" category criteria. If monitoring shows a conflict in any "M" category allotment (for example, conflicts on specific parcels of public land in scattered ownership areas, wildlife goals are incorrect, or major wildlife use changes), the allotment may be shifted to the "I" category. Then wildlife habitat goals, domestic livestock forage allocation levels, or watershed condition goals and management actions would be adjusted accordingly.

15.7 Page 120 defines range improvement as used in this document.

15.8

- d. Table 1-2 on page 18 needs a statement that tells the reader that an 'I' allotment will be reclassified to 'M' if range condition and trend, management, and resource conflict problems are solved.
- e. We suggest that the 'I' category table be subdivided in a fashion similar to the 'C' category table. 'I₁' would identify those allotments where livestock grazing and management are the primary reasons that the range is not responding as the RLM would like. Situations that would result in an allotment being classified as 'I₁' include overstocking, continuous, heavy grazing and frequent trespass. 'I₂' allotments would identify those situations where range conditions are a result of overuse by two or more grazing animals, or the grazing animals actually conflict. It is important that the reason(s) an allotment are classified as 'I₂' are given. Situations that would result in an allotment being classified as 'I₃' include areas where unexcused values are considered to be of great enough importance that every effort must be made to maintain plant cover, or range trend decline is due to heavy erosion use by wildlife or wildlife and livestock. Range condition and trend problems may provide the data base leads us to the conclusion that management action must be taken. However, the action taken may be based on public opinion and when such a situation exists it should be an intent (i. e., The RLM may need to be making statements such as, "The RLM

15.8 See Text Revision page 16.

15.9 The range condition can vary by allotment from poor to good. The categorization process is discussed on page 3.

15.9

- realize that various risk and envelope use in causing the undesirable change in range condition that we have observed. However, it is our judgment that the public wants these wildlife species more than it wants the cattle and sheep that also use this range. Therefore, it is our decision to reduce domestic livestock on this range so that the total forage harvest is reduced. The RLM believes that this action will stabilize the range in its current condition and that some areas may actually improve. The RLM will work with the Game and Fish to maintain wildlife numbers at the current level so that any improvement made possible by the livestock reductions can occur.
3. 'C₁' Category Allotments (page 18)
- a. We do not understand what "variable" range condition means (from a user characteristics). We understand that production varies due to climatic and other conditions, but we question that "range condition is variable".
- b. Change item 3 under Characteristics to "ecological potential".
- c. We doubt that this category really represents a more covered condition management. Our Management Actions statements indicate that the RLM intends to exert a great deal of control over the livestock use and management of these allotments. We think this is proper where range conditions are unmanageable, trend is declining, and livestock grazing is the major cause of the problem. We recommend, however, that you change the 'C₁' category to an 'I₁' category. 'I₁' would be limited to allotments with low ecological potential, but that the RLM will exert considerable

Mr. John Monahan
Crown Creek EIS

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control over.

4. "C₂" Category Allotment (page 20)

- a. We agree with the "C₂" category. However, we suggest that you clarify what "variable" range conditions means, add a statement about "preventing resource use conflicts from developing in "C₂" allotment (as part of the Management Objective statement), and clarify the problem in range improvement versus plant treatment definitions previously mentioned.

In summary, we think the categorization process is a major step forward in how BLM approaches its livestock grazing management program. The comments made above are intended to help fine tune the categorization process. We think the suggested changes will result in better public understanding of what you are doing and why.

We are very pleased with the consultation you imply the BLM will do with the ranchers. We encourage you to involve the ranchers in discussions with BLM and the Game and Fish at the same time as the three of you can attempt to solve problems rather than the BLM always being placed in the middle.

We are very pleased with the process that will be used when grazing decisions are issued (page 30). The information the decision document will include (particularly the resource values to be evaluated and the desired changes in resource values) will assist the ranchers and the BLM to properly evaluate the program being made. This information will also prepare the rancher to work with the BLM in meeting the management objectives.

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Crown Creek EIS

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We should have mentioned the most concern earlier so that it would appear in the same order in our comments as it does in the draft EIS. We do not believe that Alternative J should be labeled "No Action". We understand why this alternative is included in the EIS, but present that "No Livestock Grazing" represents "No Action". Removal of livestock from BLM lands in the Crown Creek area is action. The "No Action" please to first used on page 9-1 of the draft EIS.

We commented above about our concern relative to the low amount of small plant production that seems to have been allocated to a grazing animal. We know that much of this plant production may not have been allocated because it occurs on lands thought unsuitable for grazing use. We suggest you fully explain the reasons why only 37 million pounds (out of 621 million pounds) are considered forage production available for proper use by livestock, wildlife, and wild horses. How much of the total production is unsuitable because of range unsuitability? This information will help the reader of the EIS understand what management practices may be needed to better balance forage supply with forage demand (these comments are directed toward the "Productivity" and the "Sustainability" discussion on page 36 of the draft EIS).

You indicate on page 46 (Dependence of Users on BLM Grazing Permits) that BLM lands produce 20 percent of the forage demanded by livestock in the Crown Creek area. However, Table 31 on page 8-1 indicates that removal of all grazing from BLM lands would change demand for livestock forage by a -30 percent. We do not understand the relationship of these two estimates of grazing use. Also, if we read Table 31 correctly, Alternative

15.10 The reason the no action alternative is also the no grazing alternative is because in this alternative, the BLM would take no action to renew the existing grazing permits after they expired (in approximately 1989). This alternative does not analyze the cancelling of existing grazing permits, which would require an action by the BLM, but would simply allow the permits to expire and take no action to renew them.

15.11 See Text Revision, page D-18, Appendix D.

15.12 The 30 percent change in demand for livestock forage is based on the statement on page 103, Livestock Grazing, third paragraph, which indicates that the 48 permittees with at least one "I" category allotment get an average of 30 percent of the total livestock forage requirements from public lands. The text was revised on page S-2 and S-5 to clarify this information and avoid confusion.

Mr. John Moorhouse
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15.13

13- No Livestock Grazing should result in a 100 percent reduction in Demand For Livestock Forage from BLM lands. We hope you can clarify this situation in the final EIS. Explanation of how you arrived at these figures may be sufficient.

15.14

You discuss on page 67 the Land Income and Employment situation. In the fourth paragraph you indicate that 30 full time jobs are dependent on public land grazing. Does this include the ranchers (76 percent) and their family members that work on ranches that use public lands, or does this figure represent only hired employees? Can you estimate under the No Livestock Grazing alternative how many ranches would go out of the livestock business or have to be reorganized to stay in the business?

We fully support your ideas for creating new wetland areas by revegetating rangelands, stream, spring developments, and then fencing wetland areas off from livestock grazing. What this does is create new habitat and you can't let livestock become dependent on it. We think this is more desirable than fencing large amounts of existing wetland or riparian areas that livestock have traditionally used. You may have to fence some circum-estuarine areas, but emphasizing newly developed areas should reduce the need to disrupt existing livestock management patterns.

We encourage you to consider establishing areas of created wetlands away from riparian areas or far livestock use during the early years.

15.13 See Text Revisions page S-2 and S-5.

15.14 See Text Revision page 69 and Response 6.6.

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15.15

We think the use of created wetlands will reduce pressure on native ranges—including riparian areas—during critical periods of plant growth and soil moisture. Some existing areas of created wetlands may need to be rehabilitated. We caution you to not think that you can establish created wetlands in an area and it will take care of itself. You will have to establish proper management on created wetlands pastures, just as you will have to establish proper management on native ranges.

We question the assumptions built into Table 3-6 on page E2. The far right hand column (rows 1 and 2 which correspond to the existing environment and the proposed action) indicate that a three percent change in plant cover will result in a 48 percent reduction in sediment yield (columns 1 and 2, same row). This Table also indicates that continuing the present management (row 3 which corresponds to alternative 1) will cause plant cover to decrease from 28 percent (existing environment) to 12 percent. Neither of these predicted changes seem reasonable. We do not believe that a three percent change in plant cover will alter sediment yield by 48 percent, much less by 48 percent. Previous work by regional watershed managers indicate that 40 to 70 percent cover is needed as a watershed to influence sediment yield. On areas where this much cover cannot be achieved, other factors provide the primary control over erosion. Other work indicates that the Grass Creek area (flow is precipitation rate in which we have no control over erosion. In your dry areas, there is not enough precipitation to grow enough vegetative cover to control erosion. Fortunately, there is also not enough precipitation to cause erosion. In high precipitation areas (15 inches or more of annual precipitation) there is enough moisture to cause erosion,

15.15 See explanations in Appendix E, pages E-3 and E-4. Each of the figures for sediment yield and vegetative cover, for the proposed action as well as the existing environment, was calculated separately. The proposed action's improvements in range condition by one class, (e.g., from fair to good) would lead to increases in vegetative cover on individual "I" category pastures and allotments, and increase the average for the planning area from 26 to 29 percent. This percent increase was not based on sediment yield. However, proposed vegetative cover change per allotment was part of the calculations for sediment yield. These calculations by "I" allotment were based on changes in four PSIAC factors (see Appendix E), and the smallest change was in vegetative cover. The largest factor change was for land use (season of use) which would have the effect of decreasing soil compaction and increasing moisture infiltration. In many allotments, when the vegetative cover factor (as part of ground cover) changed by 1, the land use factor changed by 10 or 12. Thus, according to the PSIAC equation, vegetative cover changes alone would account for a small portion of the change in sediment yield.

For other figures on Table 3-6, ratios were employed to obtain comparative values for alternatives 1 through 4, based on the EIS preferred alternative. The average percent vegetative cover for Alternative 1 should be approximately 24, based on apparent trend acreages given on Table 3-1, page 72.

We maintain that changes in vegetative cover, even of small magnitude, will affect sediment yields. But the majority of such effects on Grass Creek lands are the result of the total changes in watershed conditions and use.

Mr. John Moorhouse
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but that moisture is used by the mesquite to grow a protective plant cover. This is generally true under proper management. In the 10 to 15 inches of annual precipitation area, there is periodically enough moisture to cause well erosion, and there is periodically enough of a failure to get sufficient moisture (though) to grow a new continuous plant cover that erodes to high. Much of your last answer to be in a sense that nature has decreed a high rate of soil erosion. We hope that you consult Table 3-4 prior to publishing the final EIS.

15.16

We worry that our ignorance may show through here, but we do not understand Table 3-10 on pages 92 and 93. We particularly do not understand what you are trying to show with the "Competitive Forage" column or how that data was collected.

15.17

We are almost violently opposed to Figure 3-2. We do not believe that "Relative big game carrying capacity by alternatives" should use Game and Fish Goals as the base. We suggest that the base (i. e., the 0 percent mark) reflect the current numbers. Game and Fish Goals can be placed on the Figure as an Alternative. Rereading of this Figure with the current statistics as the base will show that all Alternatives except "No Change" and "Pastureless Livestock" will result in more big game in the future than we now have. The "Optimize Livestock" alternative almost produces more game. We also suggest that you draw a line almost straight down from the "No Grazing" line to remind people that rapidly growing wildlife populations often are then subject out of houses and homes and large numbers of animals die from starvation. People need to be reminded of this neglected fact so that they do not automatically vote for a +300 percent increase in big game numbers by year 15.

15.18

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We believe that you have adequately stated that Figure 3-7 represents "carrying capacity" and not what you would allow even if the "No Livestock Grazing" Alternative were chosen. It might be wise for you to discuss the range capacity that would occur on public lands (and on private lands in commonwealth) if the +300 percent change occurred within 15 years.

We question your listing water and forage consumed by livestock and wildlife as "irreversible and irretrievable commitments of resources". Water is a resource that cycles and forage is usually thought of as a renewable resource. If you list these two items under this section in the final EIS we should change the statement to say you are "irreversibly and irretrievably lowering the opportunity to use water and forage during a period of time that is indefinite".

15.19

The EIS does not say whether the proposed action or any of the alternatives will actually put any ranchers out of business. This assessment should be made. If any of the alternatives result in a ranch being put out of business, then "Whereas land" should be included as a irreversible and irretrievable commitment of resources.

We know many of the preparers personally (page 12-13). We want to compliment them for doing a good job in preparing the draft Grass Creek Grazing EIS. We know that there have been many long nights spent in this effort. We also, know that many tense situations have occurred. We commend you and the staff for carrying through with a very difficult assignment.

15.16 See revisions for Table 3-10 on pages 92 and 93 in the text. "Total Forage Consumed" = (the sum of each species x consumption rate in pounds of forage per month x season of use in months) by allotment for all allotments in the Grass Creek EIS area. "Competitive Forage" is based on dietary overlap, the amount of similar forage species in the diets of wildlife and wild horses that could be used by livestock. The figure in the table is the sum of the competitive forage in each allotment by species and class of livestock in the allotment. This figure quantitatively displays the relatively small proportion of the livestock forage base impacted by wildlife.

15.17 The Wyoming Game & Fish Department strategic plan goals are set at a level of carrying capacity as modified by "reasonableness" (i.e., political concern, administrative constraints, etc.). These levels are usually between historical population high and low levels. The current big game population levels are below this point. The BLM is committed by cooperative agreement, as well as by law, to strive to provide wildlife habitat at "reasonable" levels. We have accepted the G&F strategic plan goals as reasonable levels. Showing the carrying capacity in relation to the G&F goals indicates the true situation.

A wildlife population "crash" would only occur if, and when, the habitat carrying capacity is exceeded. The G&F is responsible for assessing this population carrying capacity level and re-establishing goals at that point. Also, we have clearly stated in the draft that population levels would not increase beyond the G&F goal level; only the carrying capacity of public lands would increase.

15.18 The "no livestock grazing" alternative would release many times the amount of forage currently consumed by wildlife, and wildlife populations would most certainly respond to this tremendous "flush" of new forage. A check with three northern Rocky Mountain game ranges indicated that game populations in these areas increased an average 300 percent when livestock was removed. Furthermore, recent historical game populations in the EIS area are known to have been considerably greater than 300 percent of what they currently are (see Response 15.17). The impacts of an increase are explained on pages 86-100.

15.19 Grazing reductions associated with the proposed action and alternatives could affect an individual's ranch value, net returns, and ranch financial position. When loan factors such as ranch value, loan to appraisal value ratio, debt to asset ratio, and repayment ability are adversely affected, it may be more difficult for the rancher to obtain a new loan or operating credit, or refinance an existing loan. The financial impact of this would depend on the characteristics of the ranch and the management ability of the operator.

Mr. John Neufbauer
Green Creek EIS

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We have two suggestions for the Bureau that we think will help them in successfully developing future EIS's.

1. Given the livestock orientation of these Court mandated EIS's it is highly important that future teams include someone who can assist the BLM in evaluating livestock management activities and possible impacts of such activities on livestock production. You may want to hire this individual as a BLM employee or "hire" an outsider to participate. It appears to us that most interest groups (wildlife, forestry, recreation, fisheries, and cultural resources) have a direct connection to the EIS team through team members who probably have close professional affiliations to the interest groups. It could be wise if range managers represented livestock interests, but we do not. Therefore, we think it only fair that livestock interest be represented on the EIS team—maybe in equal numbers to other disciplines.
2. We strongly feel that the Resource Area management team should be involved in all phases of the growing EIS preparation. We find it inconceivable that the expertise represented by Area personnel is not fully represented on the EIS team. Likewise, we cannot understand how the EIS team can establish the management direction, and then the Resource Area people are left to carry out the direction. We think this undermines any confidence the ranchers may have in long-term commitments made by the BLM. We suspect that such a situation has less than a desirable effect on BLM employee morale (EIS team does not get to follow through with management, and the Resource Area people don't get to determine the management needed).

15.20

15.20 The EIS team is made up of Resource Area personnel plus specialists from the District staff in fields that are not staffed at the Resource Area level (archeology, hydrology, etc.). Where a field has more than one specialist (e.g., wildlife) the Resource Area staff person was designated as group leader. In addition, although the Area Manager is not listed as a member of the team, he is responsible for the proposed action. The MFP recommendations which are the basis for the proposal and Alternatives 3 and 4 are his recommendations.

Mr. John Neufbauer
Green Creek EIS


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John, we thank you for the opportunity to enter into the management process that will occur on the Green Creek area. We have our thoughts are helpful. We stand ready to assist you and the BLM in any way we can. Please let us know how and when we can be of assistance.

We have provided copies of these comments to ranchers in the Green Creek area. They know that we were preparing these comments and asked us for a copy. We also stand ready to assist these or other range users in bringing the Green Creek EIS to a successful conclusion.

Sincerely,

F. E. Nash,
Professor and Head
Division of Range Management

Yours truly,

Daniel Rodgers,
District Range Management Specialist
Division of Range Management



Hot Springs County
Sportsman's Association

THERMOPOLIS, WYOMING

16

6/10/82

92 Moosehouse:

On page 92 & 93 you have a very little percentage for wildlife, it says the average man gets 95% of the grazing, what are you doing for wildlife. Table 3-10 says 3% all. Are the managers so greedy of percentages that they have to run so much livestock 95% overgraze so badly? What would they be without using our sheep ground. How can people enjoy the miles run through without wildlife

Your opinion from is very inadequate. My observation is that cattle or sheep will destroy our river creek bottoms or ponds, because of water gates of a few range managers. Not livestock run through there does because of poor management. For example upper Owl Creek is so full that has been overgrazed for years. I don't hardly a well over population to handle a tract of fish



Hot Springs County
Sportsman's Association

THERMOPOLIS, WYOMING

Tables 3-9 & 3-12 doesn't have any provision for fish or waterfowl. The BLM should have more toward education #4 as your total overgraze

of your
Jim Foster
Pres.

Jim Foster
130-nos 257
Thermopolis Wyo
82443

Phone 564-2727

Moose
Cathy M. Foster

17

June 9, 1982

RECEIVED

JUN 10 1982

SUN 10 1982

Mr. John Westhouse
Team Leader, RSM
Box 115
Worland, Wyoming 82401

In studying your Grass Creek RSM Study, I feel that wildlife has been put to the south of the two crane areas. Proper management of these allotments would greatly help wildlife as well as the livestock. For instance, page 17, #1-2 shows management objectives for livestock but no planning for wildlife. I feel that habitat management plans should be set up for places such as South Fork Canyon and the upper Owl Creek because of gathering the red sheep herds due to poor winter ranges. There appears to be a great imbalance in the supply and demand as when in winter shall not fail. The average person can see that if the take is greater than the supply, it won't be long before the remainder is zero.

One area that needs more attention is the stream bottom areas due to overgrazing of livestock. Working proposed in Table #1-4, page 17 will improve these areas. I also feel it is unacceptable for the "A" and "C" categories to be allowed to overgraze streambeds and river bottoms due to the reason of overgrazed land pasture. These categories can be changed to wildlife habitat and used by sheep etc. I also think the 100 acre range should be strictly waterfowl and trout from the wetlands concerned, but the livestock remain (page 17, #4-8 and #1-12).

I feel that the RSM should select alternative #1 or a better proposal but nothing less. We have to remember RSM and if everyone land not just a select few. We definitely need to manage these special winter ranges to guarantee enough food left for wildlife. After all, the wildlife need their fair share of the midnight and land use, and a sense of wildlife in the livestock RSM is by far not a fair share (page 10, table #1-10).

Sincerely,



Jay Ableson

TH/ja



Hillberry Cattle Co.

Box 1015
Worland, Wyoming 82401
June 9, 1982

18

WE

Members of Land Management
efficiency Committee



It is to review the Grass Creek RSM and for make our Wildlife Creek allotment up, 1978 (the voluntary) 1. believe

1. we were never consulted either on the ground during survey, or at anytime, anywhere, before being told we had.
2. there is no indication of proof that our allotments have deteriorated in the last thirty years.
3. adverse land use is continuously deteriorating.
4. from people of experience, as how that reduced numbers will not increase wild weights on allotment 1978.
5. in resolution was taken for habitats.
6. do not believe the group really use habitat with growing habits of livestock, or with planning operations.
7. the attitude of the officials in the Woods office does not make for good relationship.
8. there are many other reasons to protect the Grass Creek RSM.

HILLBERRY CATTLE COMPANY


Jay Ableson
Box 1015, Worland, Wyoming



19

WYOMING ADVOCATES FOR ANIMALS
214 East Parahling Boulevard
Cheyenne, WY 82001
June 8, 1982

Mr. John Moorhead
Tame Lands
Bureau of Land Management
P. O. Box 119
Worland, WY 82401

Re: Grass Creek Grazing Draft EIS

Dear Mr. Moorhead:

We have studied the Draft Environmental Impact Statement and wish to comment for the record.

Alternatives 1 (no change) and 3 (optimize livestock grazing) are fully unacceptable to Wyoming Advocates for Animals.

Although it does appear possible that total income would be decreased and perhaps a disruption of traditional grazing operations on public lands would occur, nevertheless it seems to us that a combination of Alternatives 2 (no livestock grazing) and 4 (lands for other uses) would be the best feasible plan.

We are committed to the principle that "All life forms have a right to exist. We are not committed to the principle that a special interest group should be allowed unlimited resources at public expense, feeling rightly that the special livestock interests have prevailed to the detriment of other interests, and that the ideal of multiple use has not been reached because livestock interests have too long prevailed in demanding what should be considered a privilege and not a right."

We are at any rate totally opposed to full removal of wild horses. We are opposed to any plan which will not leave wild horses in manageable numbers on range that will support them nutritionally. We are opposed to any plan which does not make adequate forage and range available to adequate numbers of wildlife. Obviously, too much of any one thing, whether livestock, wildlife or wild horses, could be detrimental. A balanced view that would satisfy all interests, without one overwhelming the others, is the goal which we feel should be the ultimate aim.

We do not believe that dollar figures simply because there might be a decrease of income on the part of livestock operators should be a contributing factor in weighing all sides of the issue. We also realize that is a simplistic view, but nevertheless it is one to which we subscribe wholeheartedly.

Mr. John Moorhead

-2-

June 8, 1982

In summary, our commitment then would be adequate public land use for both wild horses and wildlife, with the livestock operation coming in as a third use only where such livestock would not damage the range to the detriment of all three interests. We are particularly opposed to over-use of public lands in any area by cheap interests.

Yours truly,

WYOMING ADVOCATES FOR ANIMALS
James R. Stelling
(Mrs.) Deanne R. Stelling
President

RESPONSE TO LETTER NO. 20



20

State Representative
Jeffrey S. Smith
June 8, 1982

Bureau of Land Management
Box 110
Northwest, Wyoming

Dear Sirs:

In trying to read and understand the Green Creek Grazing Permit # 12, when I found inadequacy, several points stood out throughout the statement. There is a prohibition against spring grazing without any pertinent documentation to back it up.

I could not find any reference to quality of forage, only pounds available, which is inadequate to estimate the carrying capacity of any allotment. I could not find any reference to the availability of salt licks on a key species which is a very high protein feed for livestock and sheep.

Permittees cannot be expected to finance range improvements with no guarantee that they will be able to use them to their fullest extent. That responsibility has been charged to the BLM and funds supplied through the BLM Funds, Federal Land Policy and Management Act, and Public Rangeland Improvement Act.

Fences erected to preclude exceeding the existing visual class once are by no means practical and should not be built using this criterion.

Reading the list of preparers I found inadequate consultation and coordination in regards to livestock management. There were no ranchers, who are experts in that field, or any other qualified personnel for any input on livestock management, which should be imperative to implementing a plan of this type.

Over the years since the Taylor Grazing Act the BLM has allowed and encouraged with values being set and recorded on BLM's attached to those property that has been sold and resold. It is not in the best interest of all parties concerned for the BLM to be able to reduce the number of BLM's already established with a substantial value. I would be interested to know the legality of this aspect of

the plan proposed.

If the BLM had properly managed the public lands as they suggested individual operators would have there would be no need for a reduction of grazing as this study indicates.

Respectfully,

Jay S. Smith

Allotment No. 0508

20.1 See Response 2.5. Nuttall saltbush is an important winter sheep and cattle forage plant during the early spring, but is seldom considered a key species for indicating plant community changes.

Portland, Oregon
June 1, 1987



Mr. John Moorhouse
Box 119
Portland, Oregon

Dear John:

In response to the Grouse Creek Grazing District's (GCD) Statement, I find it very confusing and misleading, as well as, a breach of faith from the BLM. I'm enclosing a transcript of the July 27, 1987, meeting when District Manager, John Katsenelson, stated that the information taken from the B.L.M. administrative range allocation, could not be used in determining adjustments of suitability, line A-CB of the transcript. Yet, I find some 25 places where it has been used. BLM, was this misleading information used, when we were told it would not be?

I would like to ask you about the paragraph (page 110-113) telling this to be an edited grazing statement, WHY, was no one with actual range experience used in preparing this grazing statement?

My first impression upon seeing the Grouse Creek Grazing District's was a waste of money, when the outcome was already predetermined by a District Manager that had access to a multimillion dollar computer, that could and did give him any answer that he wanted. One of the range facts, that responded to Question six, felt the same way. None of the range facts were consulted when the survey teams were on their assignments. If they were consulted, it was after the fact, and within 15 days, was any of their report used?

About the satisfaction process, the period for comments came at a very busy time of year for the stipends and is also very hard to understand the way it is written. I have seen some Grazing Statements that were a lot easier to understand. The B.L.M. was done in the Grouse Creek Area with inexperienced personnel, under very poor leadership, that were assigned 100 and 5 miles from where they thought they were on the map.

It would be extremely difficult to respond to all of the errors in the Grouse Creek Statement, but it is very obvious. It was done by people with very biased opinions and strong directions. I will attempt to give a few of the errors that I have noticed and would like a response to each and every one of them.

Page 2

- 21.1 Page 4 17 allotment No. 0623 is listed in the C category, yet in the figure 1-2 map it is listed in the I category. WHY? Allotment 0623 has been in an A.M.P. since 1979. The evaluation team by BLM Employees have been given credit since that time. In 1979 District Manager, made the evaluation, it was excellent with upward trends, although we had only used 1 of the allotment with the full use of 400 A.M.P.s. In fact, the one I that we had used was so good he asked me when we were going to use it. If we had an honest unbiased evaluation of allotment 0623, it was sure it should be placed in the I category. Why, were no transcripts made at the top of Goat Ridge, where the major forage production area is? There is no transcript in this area that is any where comparable to the top of Goat Ridge. WHY, were they made along the main livestock trails and roads between the two water holes.

- 21.2 The number of wildlife in Allotment No. 0623 is not accurate. Any were taken off a 1973-75 estimate. Besides that, we counted 905 of the forage for which used wildlife on our meadow. Yet, they are also taken off the Public lands. WHY, are we charged twice for the wildlife in this allotment? The fence line and boundary line are not accurate. There are some rather large areas left out of the boundary line at Goat Ridge.

The criteria used for rehabilitating the allotment is not accurate and is not recognized by any of the professional people from the University. A more realistic method of rehabilitating carrying capacity, would be actual use records which you have had in your office since 1975.

Allotment 0622

How low, and allotment, border figure 1-2, are not accurate, as the fence in Section 5, T 44, R 86, follows the township line, yet the map indicates differently. In section 7, the figure 1-2 map shows 100 acres of BLM land as being private. WHY, are these obvious errors allowed, as you have spent in excess of 1 million dollars on this survey. Do you know the BLM ever consulted us as to when they were going to be on the allotment to make any of these surveys. WHY, no one from the BLM ever contacted us prior to the allotments being categorized. Only after the fact, and they never asked us to go out on the allotment for any input from us.

Allotment 0616

- 21.3 Appendix E shows our fence 4/78-5/79, 11/26-12/73. This has never been used in February. Reliability of 716 is not accurate. Historical should be April 1960-12/75, not 11/26-12/73.

RESPONSE TO LETTER NO. 21

21.1 Allotment 0623 should be in the C1 category.
See Text Revision page 6, Figure 1-2.

21.2 See Responses 4.5, 10.2.

21.3 See Text Revisions Appendix B.

Page 3

Allotment 0620

Allotment 0620, not right, should be 0620 not 0620. Forage amount not right, should be 1700 not 870. Sustainability of 785 is not appropriate.

Allotment 0621

Final demand 364 not 275, should be more realistic to contain needle and thread areas. Far more than 600 of the allotment is suitable for grazing. Also, in Allotment 0621, not listed in table 2.3 excepted? Allotment 0621 is not listed in table 2.3, Appendix A, 407. Table 2.3 lists 23,200 lbs of forage, 150,000 lbs of forage, not only 200,000 usable when the actual not suitable and should be realistic by realistic people indicate that this allotment would be restricted to go to 1000 more livestock was more made of it to be realistic the amount of forage and then, as well as, keeping the horse grounds more palatable. You also fail to mention that all of the water in this allotment, as well as, most of the other allotments in the Grass Creek Resource Area, is not produced by private investment. This allotment should be placed in the Grass Creek Area. It is not used to a climate protection as any allotment in the Grass Creek Area. If Allotment 0621 qualified for an E category rating then 0621 should be in E.

Allotment 0627

In Allotment 0627 Appendix A, you have listed only 10% of the forage and forage as better quality. 4077. I was not satisfied prior to any of the surveys in Allotment 0627. I have never been satisfied by the location of water and the availability of water development in this area. 4077. To credit to given for annual forage and forage, which was a very major supplier of forage to this area.

Allotment 0628

Your table 2.3 Appendix B on Historical use of water to not appropriate, as we have had some use prior to 1900, as well as, later. Appendix C list 15 head of cattle in Allotment 0628 and 7 head were used in 1900 in this allotment in my life. This figure was not taken from any source and is not personal, but by newly hired from Area Manager, Mr. Wilson, his statement to me July 27, 1991, Appendix A, table 1, list 25,000 lbs of usable vegetation divided by 100 equals 250 acres. But, we have been using 1000 acres approximately each year and your own evaluation by Mahan and Blanton, made on July 26, 1990, Prospect Pasture 0628 was in good condition and had upward trends. My theory is, only 10% of the vegetation is used.

Page 4

Appendix 3-1, Wildlife, when it actually shows private ownership, then the private owner, 421 and, when the figure was to be used to the private owner, then we must keep the Agriculture Department, in fact, the private owner actually listed that the computer was played with on the computer and also very little, if any, actually. Also the computer is not consistent with your 100 employees, because that owner was in the small business would have just got out of business. This statement was actually made by 100 employees.

Appendix 3-1, Wildlife

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21.4 Acreages shown are within the licensed allotment.

21.5 Allotment 0621 has total demand of 366 AUMs or 285,480 pounds of forage. See Text Revision Appendix A. Allotment 0525 is listed as an "I" category allotment.

21.6 Refer to Text Revision, page D-18, Appendix D.

21.7 Allotment 0620 had observed evidence (pellet groups) of elk used during the 1976 integrated studies inventory, again during the 1979 wildlife update inventories, and was again confirmed by the seismograph impact studies (20-30 head repeated observed and reported) conducted in 1981 by Mile-Hi Exploration. Documentation of this information can be reviewed at any time in the Worland District Office.

21.8 The livestock budgets displayed in Appendix I are based on data that were reviewed by livestock producers in the Grass Creek Resource Area and local lenders. The data were modified by the ESS only in response to suggestions made directly to them by ranchers or lending institutions. Kerry Gree did consult with Gordon Kearl in compiling this data.

The percent increase or decrease displayed in Tables I3 and I4 represents adjustments in rangeland forage supplies not in herd size or even total forage. A 100 percent adjustment in rangeland forage supply may only account for a relatively small percent of a herd's total forage needs.

21.9 The specific statement referred to is not clear, but the statement under Riparian, page 58 does not necessarily conflict with statements within the University of Wyoming's draft "Proposal to Study the Effects of Selected Grazing Treatments on Channel Morphology and Sediment Within the Riparian Zone of Fifteenmile Creek." Within this document on page 15, the following statement is found; "Of special interest are impacts to trout habitat from intensive livestock use of perennial stream zones (reference Grass Creek DEIS). Trampling of streamwide habitat may cause bank sloughing, channel widening and soil compaction. Channel widening reduces depth. This phenomenon may be disadvantageous to perennial streams but advantageous for repairing ephemeral streams by using livestock hoof action for bank destruction and managing vegetation for channel stability."

.....
 (John Sprague asks Elmer Scott, attorney, to address the question of Public Information what is available..... would not be. #76?)
 (ELMER SCOTT):
 "I'm afraid I can't. I don't know. I have never read those new Acts.....Freedom of Information Acts. I really can't discuss them intelligently."
 (JOHN SPRAGUE):
 "Yeah, well I just have no opinion. You know they're public records and I know any other public job I've been involved in, they are public."
 (ELMER SCOTT):
 "Not all public records are public. There's certain confidential information.....involved in the person and it cannot be made public....."
 (JOHN SPRAGUE):
 "Well, I'm certainly glad to hear that at this time."
 time.....

 (JOHN SPRAGUE) (SINGS):
 ".....
 I.....
 recognizing that they don't have the funds to do an inventory of every piece of range in the western United States. The approach is that you do an allotment.....
 In other words you go out and you look at the problem and you identify those problems and then you make a determination. You also look at how well someone you look at the potential productivity of the range, and then you make a determination in terms of M. I. C. You don't do the inventory first. You go into the categorization and then a you would only do an inventory on those allotments that are in I category....."

RESPONSE TO LETTER NO. 22

22.1 The BLM uses a standard set of fencing stipulations which are accepted throughout the western U.S. The Bureau fencing standards have been tested and proven effective at numerous locations over a number of years.

22.2 The DEIS has a proposed action and various alternatives which are analyzed. The final decision could be the proposed action or one of the alternatives, or a combination. The pounds of forage data came from the SVIM inventory completed during the 1977 to 1979 period.

22



Bureau of Land Management
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RESPONSE TO LETTER NO. 23

23.1 See Text Revisions, page 33.

23.2 See Response 6.4.

23.3 See Response 4.5.

23.4 Table B information is based on data input into our RMAS Computer Billing System in the mid-1970's, and the information in Table D came from the SVM inventory.

RECEIVED

JUN 11 1982

Carl Frank House
Pittsburgh, Pa. 15214
June 11, 1982

Bureau of Land Management
John Johnston
Fort Collins, CO 80521

John Johnston

First off, I am sorry that I was not able to get back to you in a timely manner. I have been very busy with other projects and have not had time to get back to you.

Now, I am sorry that I was not able to get back to you in a timely manner. I have been very busy with other projects and have not had time to get back to you.

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23.4

Sincerely,

Stanley Bergeron

(1)

Is this a copy of the original?
My (unclear) (unclear)



June 9, 1982

Gentlemen,

As Vice-president of the Big Horn Basin Wildlife Club, I would like to comment about your Grass Creek Environmental Impact Statement. It is of deep concern of the members of this club that your study fails to show much relief in the future for game, non-game, fisheries or riparian habitat. The domestic livestock/game animal ratio seems to be out of balance in favor of domestic animals. It seems sportman (especially hunters & fishermen) have had it so good for so long that they're not very vocal in giving their opinions but we believe if these ratios continue, the wildlife will be in serious trouble. Once the damage is done, it takes years to correct the problem. Let's take the necessary steps now to stop overgrazing of domestic livestock, especially on wildlife's winter game range. Game animals are being unnecessarily pushed higher and further into the wilderness to survive.

We know the BLM is accused of not helping the rancher but at the current price of an A.B.M., it is a giveaway. We feel the wildlife and outdoorsmen are paying the price of poor control on federal lands.

We also feel the statement fails to give any importance to fisheries or riparian habitat.

Sincerely,

G. E. Chamberlain

Vice-President, Big Horn Basin Wildlife Club

P.S.

Otherwise it is the best alternative shown in your statement, but we don't feel it's good enough. Please remember BLM lands are public lands, not domestic livestock grazing pastures.



June 9, 1982

Gentlemen,

This letter is to inform you of my feelings as a concerned outdoorsman about the Grass Creek Environmental Impact Statement. I'm an avid outdoorsman and the Grass Creek area is one in which much of my leisure time is spent. Surveying is my profession and much time has been spent in this area working in oil field related work so I do feel as though I know the Grass Creek area quite well. Through the years I've become quite concerned with the reduction of game herds in this area and the amount of overgrazing done by cattle and sheep. High fences have been erected in many places and I've personally seen how it affected the movement of game animals. The oil field work has had a devastating effect on these animals and I'm personally sick and tired of only hearing from the ranchers and oil companies. The game and non-game animals were in that country long before domestic animals and oil companies and yet they certainly seem to have taken a back seat to them. I realize that much of the land is private and that you have to have good communications with all facets using the resources so as to co-exist but as for BLM land, it is federal land and belongs to the public, not the rancher. The overgrazing of domestic animals is deplorable and it's very frustrating to not see more being done to stop it. Your statement, if anything has not gone far enough to help preserve wildlife habitat of game animals, non-game animals, fisheries and riparian habitat. Certainly otherwise it is the best but I doubt that it is severe enough to really help the situation. As you know your decisions are very critical to the wildlife's future. Please consider them carefully.

Sincerely,

G. E. Chamberlain

27

RECEIVED
 JUN 11 1982
 BUREAU OF LAND MANAGEMENT

Dear John:

Bureau of Land Management
 Box 119
 Portland, OR 97201

Dear John:

After reviewing the Grass Creek Environmental Statement, there are a number of articles we wonder what you are basing your recommendation on.

1. Table 1-4 Allotments 0502 and 0506 - Charge of Forage Consumption
 Why do you want to charge the 1 category, and does the operator have any track in the charge?
2. Appendix A Table A2 Allotment 0506
 There is no reference to the wild horse demand for forage.
3. Figure 5-5 - Wild Deer Supplementation
 The show (on the map) that the deer use the creek bottoms and meadows in the winter and the high ridges in the summer. In our area it is just the opposite.
4. Appendix A
 Table A3 does not agree with Table A2 as to feed produced and demanded in Allotment 0502.

In our Selective Management Interpretation (Allotment 0501-Conflicts) we know that the riparian habitat has improved 100% in the past 15 years.

Does the base property receive credit for the off allotment (fenced creek bottoms, hay and grain fields, core fields, etc.) feeding and browsing by wildlife?

It took the BLM several years to draft the EIS and the Permittees are only allowed 45 days (in a very busy season) to go over it to figure out how it will affect their various allotments now and in the future. We feel that we need additional time to study this impact statement and also time to consult professionals in this field for rebuttal or conference or what this statement has to say.

We also feel that it is necessary for good range improvement practices and a long term improvement program that the ranchers who run or reimburse for the cost of improvements are given some assurance as to the number of cattle and the length of time that they will be allowed to use this livestock before they invest in this type of improvement. Range in terms would have made it more useful.

We feel the allotments could be more fully and accurately checked on horseback than by a vehicle and we also feel that one transect is not enough to cover five or six thousand acres.

We feel that in regard to this study their statements made to us by present and previous officers of the National BLM Office that more consideration needs to be given to the impact that this study will have on the ranchers and the validity of this study in regard to the problem it is trying to solve.

Yours very truly
 Baird and Sons, Inc.

RESPONSE TO LETTER NO. 27

27.1 If the proposed action is adopted, wild horses would be removed from Allotment 0508.

27.2 We agree. The way the map is printed can be confusing. Yearlong deer use (gray shading) occurs throughout the entire Grass Creek EIS area. The winter use areas (crosshatched) do occur on the higher elevations above Cottonwood Creek.

27.3 See response 10.5.

27.4 The CEQ regulations require a 45 day review period. The court order schedule (NRDC vs James Watt) for this EIS will not be met if a longer comment period on this DEIS is allowed. However, all comments received will be considered in the decision making process.

28

RECEIVED
 JUN 11 1982
 BUREAU OF LAND MANAGEMENT

John Moorhouse, Team Leader
 Bureau of Land Management
 P.O. Box 119
 Portland, Oregon 97201

Subject: Grass Creek Grazing Draft Environmental Impact Statement.

Dear Mr. Moorhouse:

After study of the subject report I feel compelled to convey my concerns over its obvious deficiencies.

There are several valid concerns:

1. The proposed action is to merely "monitor" range conditions for another 5-6 years. In other words, the action is no action. Range will continue to deteriorate for wild life as shown on Figure 5-2. That's ridiculous. Already wildlife is getting the crumps. What's left over from the preferential use given ranchers cattle and sheep. We wildlife, both game and non-game species, are to be given almost no consideration. Where is the game management consideration. Where is the non-game species consideration addressed in the study?
2. Table 3-10 is a real one-sipper. Livestock belonging to a few dozen ranchers consumes 93% of the competitive forage on public lands, leaving only 6% for wildlife. That's appalling! Surely the nation's subsistence are being overshadowed by the monetary advantages of a chosen few. Where is the equal treatment for wildlife? Who is subsidizing them?
3. Riparian habitats have been ignored in the "B" and "C" categories. Why? Surely these limited lowland stream are critical to the needs of many game and non-game species.
4. What about fisheries? What about waterfowl? What are you going to do for them if they are going to be given equal consideration to domestic stock?
5. How is the BLM going to guarantee forage for antelope, deer, etc. the more on the limited critical winter

RESPONSE TO LETTER 28

28.1 See response 1.1.

28.2 See response 5.2, 12.2.

[illegible]

The E.I.S. is failed the Drage Creek Grazing Draft Environmental Impact Statement. Drage has to do

with enough properly utilizing
rangelands and ranchers timing
that utilization with meat production.
If you go over the "last of February"
on page 113, you will find
no individual as well as Rural Management
Agricultural Economics, or Rural
Management background or degree.
1. Question: If the C.I.S. is to go on, accept and
and relevant staff and policy
a land management specialist, a geographical
Economics specialist, and a Rural
Management specialist involved in preparing
the C.I.S.?

Answer: I think so. The conference (page 1 & 2)
will go - the preparation process
include consultation with all
affected parties. Consultation has taken
place throughout the planning process
and planning, reviewing of the draft
and planning, reviewing of the draft
has been omitted. (The American Studies
Dictionary, Consult - To seek advice or
information of D. B. have agreed for).
I was never consulted about anything
in this Grass Root Strategy and
Environmental Impact Statement. The
B.M. had, for their minds, on every
aspect of this statement, then the findings
of the study and their decisions were.

(Page 3, 73) "The P.R.I.A. also
suggested that the development of an
allotment management plan should
include "careful and considered con-
sultation, cooperation, and coordination
with diverse private, public, and stakeholder
involved... including state or state
having lands within the area to be
covered by such allotment management
plan." 1. Question: If the C.I.S. is completed
and I think an allotment management
plan with the B.M. will progress
do it by itself the B.M. will progress
"careful and considered consultation,
cooperation and coordination, and not
a repeat of the actions that it
develops the C.I.S.?"

Answer: I disagree with much of the material
found under the heading of Management
Framework Plan, Policy, and Objectives. On
page 3, under the heading of Management
and Design will, under Objectives and
findings 3-4, under page 3-4 all
the principles of management planning
and design, under Objectives and other objectives
1. Question: If the B.M. will progress, will
practices? I agree it is possible
progress, but the full progress that
will not achieve, but it is possible.

page 4

- [illegible]

RESPONSE TO LETTER 29

29.1 See response 6.5.

29.2 Where fences are necessary to control livestock damage in wetland-riparian areas on public land they will normally be constructed and maintained the same as for other range improvement projects such as allotment boundary or pasture fences. All these fence types are necessary in order to achieve sound range management objectives. In cases where fences are installed to improve wildlife habitat rather than restore degraded areas, major funding and maintenance responsibility would be incurred by other programs such as watershed or wildlife. Grazing of most fenced wetlands-riparian areas will be allowed as long as the objectives for fencing the area are accomplished.

page 5

- 0131 + *if change not a lot more 0.339*
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page 6

12. Question (page 87 last 2) Why is the SUJM inventory used again as a criteria for determining "Opposition Front" when the DLM has said they would not use SUJM because it is inaccurate and unreliable? (page 15) Will anyone in the land clear land or said to have been 80 bad?

29.3

294

29.5

29.3 Figures are from actual aerial counts on August 5, 1980. Wild horses were counted in allotments as follows: 0538 - 18 horses, 0503 - 9 horses, 0590 - 21 horses.

29.4 The rationale for including the no livestock grazing alternative in this EIS is to provide baseline information against which to measure the results of all other alternatives considered, including the proposed action. Also, a key purpose of the alternatives is to address a range of livestock use levels. The full range would be covered by the no livestock grazing and optimize livestock alternatives.

29.5 The statement "Small increases in ground-water use would occur..." for those alternatives is based on proposals to drill new wells or upgrade existing wells to obtain a usable yield. Thus, these wells would use previously unused groundwater. Numbers of proposed wells are indicated in Table 1-8, page 35.

page 7

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29.6 See Text Revision, page D-18, Appendix D. Table D6, page D-17, lists the suitability criteria used on all allotments inventoried.

29.7 See Text Revision page D-18. Elk should be 374 instead of 274. The forage consumption figures for various big game species come from the research work conducted by the Wyoming Game and Fish Department at the Sybille Game and Fish Research Station. A letter from Dr. Hepworth dated November 28, 1979 explaining this is available for review in the BLM office.

O please gallery with the S.T.S.
appears if you compare actual range
conditions with plants given in
appendices A, B, C, D and by comparing
appendices A, B, C, D with each other
the data all other 0.5% as an example.

Table A-1 shows total available vegetation
as 115,000 lbs.

Table A-2 shows estimated demand for
forage by livestock as 343,000 lbs.
Wildlife
Total 370,000 lbs.

Table B-1 shows total demand for Wildlife
which converts to 363,950 lbs.

Appendix C shows
or by 11 years information 318 in
does means information 218 in
3132 lbs.

Table D6 shows
Condition
Land Year For Use
1196 353 302 196 353 252

93% suitable for livestock

- 29.8 How can table A-1 show total available
vegetation of 115,000 lbs. Table A-2
shows an estimated demand by
livestock & wildlife of 370,000 lbs.
(343,000 lbs. over 115,000 lbs.). Table
B-1 shows a current use by livestock
of 318,950 lbs. (302,950 lbs. over 115,000
lbs.) and yet Table D-2 shows that
the allotment is 63.3% land and 36.7%
wildlife and 11.5% land? Or for and demand?
and 11.5% land?
- 29.9 How can Appendix C show a total
demand for forage by wildlife of
313,950 lbs. and Table A-2 show an estimated
demand for wildlife of 370,000 lbs. when
you convert to a total available for land
and wildlife as above, 370,000 lbs.
In Table D-2 the allotment 0.5% has
the into concentration the category
- 29.10 How is a suitable category of 93%? Does the
the question is important? Long day with an explanation
the question of for? Very much depending
with the available category of 93%
11. How is 0.5%, 0.5%, and 0.5%? Would you please
justify these ratings or change them?
the Appendix D shows methodology
for vegetation and forage availability
Why was the SUIB inventory method
17. How is the method used? (Worldwide Livestock Management of the BLM)

29.8 See Text Revision, page D-18, Appendix D.

29.9 See text revision page A-6. Table A2 should
indicate a wildlife demand of 21,000 pounds.

29.10 Table D6, page D-17, Appendix D and page
58 explains considerations for range suitability rat-
ings.

allotment no 0504 31

John Matthews
Wyland D.L. M. Box 119
Wyland Wyo 82401
Dear B. L. M.



I don't agree with
allotment 0504 being placed in
the C category.
Reason for disagreement is because
of recommended seasonal use. Outpost
Because I only use it for cattle
the early part of the season. And
the cattle do not congregate in
one area to overgraze any small areas.
I think this allotment should
be in category M. Also available
forage shown in table A-1 is very
low.
The invasion pattern comes about the

WYOMING STATE GRAZING BOARD

CENTRAL DISTRICT
P.O. Box 204 Cheyenne, Wyoming 82001
(307) 339-2942

Mr. John Matthews
c/o Team Leader
Inland #1
Box 119
Inland, WY 82021

Dear John:

Challenger and comments on the Team's Team Check S.T.S.
developed by the WSG. As we have stated to you on prior
occasions, we do not feel confident that our current re-
sponse really for the Team Check S.T.S. area. Inasmuch
as we do not believe that an S.T.S. should be based on
seasonal average, we are extremely disappointed and dis-
satisfied with the S.T.S. and the decision decision to use
technical data in the S.T.S. which has been shown, and shown,
to be an unreliable methodology in representing the present
ecological, forage and range conditions. To date, we have not
seen other scientific evidence to insure that the quality of
the outputs from the S.T.S. inventory and its subsequent
interpretation by the WSG, using an experimental computerized
system of analysis of husband factors to S.T.S. data, will
be improved by the notion of reliability in the near future.
Therefore, we object to the use of this technical procedure
in the S.T.S.

I would like to again publicly state that we have not
and do not condone the entire S.T.S. computerized forage
allocation process or all of its components. We do condemn
the WSG's using certain outputs from this process in an S.T.S.
prior to the point when a consensus of professionals in the
range science community agrees that those outputs are satis-
factorily reliable enough to be used as a source of best available
information. We believe that data from an experimental process
and methodology should not carry the credibility of Team
available data and for this reason we object to the use of the
methodology stated in Appendix C, Team S.T.S.

Although the Title and narrative on Page 1011 states that
this methodology was used only in Appendix A, this is not so.
This methodology was used by the WSG to estimate Total Available
Forage in Table A-1, Appendix A, and in numerous other

Developed for the wide use of Wyoming's Section 2 grazing lands.

32

RESPONSE TO LETTER 32

32.1 See page 31 and Text Revision, S-1.

32.2 See text revision, Appendix D.

places in the E.T.A., then the recognized experts in the field of Range Science recommend and conduct it.

We recommend that the RFP re-evaluate their use of the computerized evaluation of S.I.V. inventory data to estimate the amount of forage available under the concept of mean use. We recommend that the following procedure and methodology be substituted for the computerized methodology recently used by the RFP in the Grass Creek E.I.B.

1. This summer, a team composed of technical experts from the Range Science Department of the University of Waterloo, the Soil Conservation Service, the livestock industry, and the RFP, verify that the existing S.I.V. data accurately reflect the existing ecological management conditions of the allotments in the Grass Creek E.I.B. area. If they conclude that the existing S.I.V. data did not accurately inventory relevant ecological conditions throughout the E.I.B. area, then they would recommend that the RFP re-inventorize this parameter using the standard S.I.V. procedure for inventory of ecological management conditions.

2. Once the proper ecological management conditions have been established, an estimate of the high and low range in available rate values can be arrived at by consensus of the technical team, using existing S.I.V. technical rules.

3. If the RFP feels it is still necessary to have a benchmark for the purposes of analysis in the Final E.I.B., they could use the mid-point of the range in stocking rate values arrived at, using the above suggested methodology.

4. RFP would fully explain and qualify the technical methodology used in the Appendix sections of the Final E.I.B.

5. We also recommend that the RFP convene a meeting of recognized experts in the field of Range Science to completely review the existing experimental S.I.V.-forage allocation procedure currently being used by the RFP. This panel of experts would be asked to recommend which parts of the experimental S.I.V.-forage allocation process is ready for use by the RFP in their planning processes and which parts still need further development, research and field testing by qualified animal researchers prior to use by the RFP in financial work.

6. The RFP would ask the Western University's Public Resource Coordination Committee or another qualified source, to have the RFP review the findings of the before-mentioned technical opinion and solicit Requests for Proposals from qualified technical opinion and solicit Requests for Proposals from qualified

sources to conduct whatever research and field testing was required to improve the quality of the outputs from the S.I.V.-computerized forage allocation process.

7. If funds required to accomplish these tasks were not available through the RFP's budgetary process, we recommend that the RFP stop the use of the experimental S.I.V.-computerized forage allocation process and use presently accepted "state-of-the-art" methodology for evaluation potential resources.

8. Because the Draft E.I.B. misrepresents the present situation in the E.I.B. area, we recommend the following solution to the problem of arrival of an appropriate S.I.V. process that the local ranchers and RFP set up a permanent management committee of ranchers, RFP, University, and other relevant scientists and others deemed appropriate by the initial committee, to review the various range of the S.I.V. for quality and quantity of data and methodology. They would then re-write the S.I.V. on its planning process. Critical items to be done: the results would be highly representative of the relevant situation and that the resulting document would be more than just an academic exercise for the purposes of analysis.

Our justification for this comment is that the present contents of the E.I.B. mean that the document was written without RFP and that multiple users outside the RFP were not provided a meaningful opportunity to compile data and information necessary to prepare a quality E.I.B. document. Much of the existing data and especially indicates a high quality estimate livestock grazing management and the proposed action does not represent the use of the most efficient and realistic basis available to planning and livestock managers. Given the computerized amount of information between the real situation on the E.I.B. area, the data in the E.I.B., and the RFP is a mixture of misrepresentation of the data, the time that the RFP for public comment is inadequate, just like the text of the E.I.B. After all, it took the RFP over five years to collect the field data and the fifteen non-E.I.B. team and members (other RFP staff), over a year to write the draft. As fact that is a mixture of multiple users should re-write the E.I.B. or its subsequent document in a meaningful way, to reflect reality.

32.3

32.3 See response 27.4.

1999]

32.4

Thank you for the opportunity to comment on the draft R.F.F. Please contact us as soon as possible on our comment so that we can use this field season to collect the needed data to solve the existing technical and practical problems in this R.F.F.

"Inevitably,

Wick Loner
Consultant for
The U.S. & Co.

32.4 See the summary description of the proposed action in this document.

33

RECEIVED

PL 14-82

Mr. Robert E. Bohse, Owner
Y & Ranch Company
P. O. Box 550
Cody, Wyoming 82414
June 10, 1982

Mr. Joe Wickman, Author
U. S. Department of Interior
Bureau of Land Management
Norland, Wyoming 82401

Subject: Grass Creek Draft of Environmental
Impact Statement

Dear Mr. Wickman:

I have just acquired allotments 0639, 0640 and sections 15 permits 2537 as of April 15, 1987, which leaves me no history to rely on. My reply to the Environmental Impact Statement is based on my judgment, your errors and obvious inconsistencies but are not necessarily in the order of their importance to the Environmental Impact Statement in general.

- [illegible]

33.1

RESPONSE TO LETTER 33

33.1 See responses 6.4 and Text Revision, page D-18, Appendix D.

332

41 The wildlife numbers for my statements 9699 and 9645 are completely unrealistic according to the Environmental Impact Statement. There are at various times 637 animals on this range. In actual count since April 19, 1982 to date, I have seen only 4 miles of 4 deer and 1 antelope on 20 miles of range. The widest stretch of imagination, there are not 50 head in all the area and when one considers that the future of my grazing permits are dependent on these unrealistic figures, it makes me wonder what the hell is there are we going and why the IDEC officials?

The contiguous landowner should be protected from encroachment; the fencing costs should be borne by the government and maintained by the government. A wild stud has no respect for a fence!

860417

RECEIVED
JUN 11 1982

34

Otto, Hys. 82434
June 11, 1982

B. L. M.
Box 119
Holand, N.Y.

Dear Sirs:

The proposed action of
discontinuing spring
grazing on any allotment
may make it impossible
for me to use any grazing
permit in the future.
In order to provide feed
for my sheep in the
spring otherwise, I would
have to cut my number
because I am using my
deducted land to hay (just
at this time). This
would leave me with a

-2-

few sheep I couldn't
afford to buy from
Killed in the hills.

If I were to use
my 10, 11, 12's only in
the fall, it would over-
graze the available fall
feed and cause range
damage. My allotment
would not provide the
additional feed to take
the place of the spring
grazing because in the
spring the sheep feed
upon the annual plants
and shrubs, and these
are gone in the fall.

Unlike the cattle,
I don't see the range
on the summer because
I have dead land on

-3-

the mountain for grazing

If it were really
necessary, I may be able
to shorten my grazing period
in the spring.

Another possibility that
might be brought would
be rotating my grazing in
the spring with two-year
sheep allotments.

The range has been
improving under the
present management;
therefore, I really see
no need for other changes.

I hope something can
be worked out because I
don't think it is just

-4-
that I should be forced
off the range.

Sincerely,
Myron Jones
New Burlington Lodge



WYOMING
EXECUTIVE STATEMENT
CHEYENNE

35



IN WYOMING
COUNTY

June 11, 1982

Mr. John MacBroom, Lead Herder
Bureau of Land Management
Box 110
Kortland, NY 14881

Dear Mr. MacBroom:

The Grass Creek Grazing Draft Environmental Impact Statement has been circulated for review to various state agencies, tribes of their interests, and enclosed for your consideration and use.

It is my understanding that factors such as estimated grazing capacities, initial stocking levels and subsequent grazing adjustments, if any, will be based on additional monitoring, operator consultation, allotment management plans and the Final Range Land Program Summary. I request that the state be kept fully apprised of these activities. There must be adequate notice and opportunity for direct state and local involvement in these activities and the related decision-making process. In particular, the state, the affected operators and other interested entities must have direct input to the Draft Range Land Program Summary. This document will contain the proposed land use planning objectives and grazing allotment decisions, so there must be extensive review and comment opportunities.

The current economic plight of the Blaine Basin's ranching industry must be a major factor in any grazing allotment decisions. While a BLM grazing allotment may provide only a portion of the income of an individual rancher, a total livestock forage requirement, a significant reduction or elimination, depending on the grazing allotment, may threaten the rancher's herd and herd manageability may prevent straight-line income herd reductions in response to a percentage loss in total forage.

Mr. John Swenson
June 11, 1982
Page 2

As the draft IIS notes, there already is a serious problem of spring range availability in the northern Basin. Further, the loss of BSN grazing opportunities would increase demand for alternative ranges, which in turn would increase the price of alternative sources. The numbers total operation value, as well as total range requirements, must be determined through affect consultation and be fully considered in any future grazing allotment decisions.

Thank you for the opportunity to review and comment on this document. Please keep me informed of the progress in this effort.

Yours Sincerely,
John Swenson

Object
Inclosures



THE STATE OF WYOMING

ADMINISTRATIVE SERVICES DIVISION

Wyoming Department of Agriculture

TELEPHONE (307) 777-1321

CHEYENNE, WYOMING 82002

36

36 MEMORANDUM

CONTINUED

MEMORANDUM

DATE: June 10, 1982

TO: State Planning Coordinator
Wyoming State Clearinghouse

FROM: Don Weiss
Assistant Commissioner

SUBJECT: Grass Creek Draft Environmental Impact Statement

Attached are the comments of Colin Fellet, Agriculture Planning & Development Division, Wyoming Department of Agriculture, with regard to the Grass Creek Draft Environmental Impact Statement.

Mr. Fellet's comments reflect those of this Department.

Thank you for the opportunity to comment on this draft statement.

JH

Hand-Carried: 06/10/82

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Wyoming Department of Agriculture

TELEPHONE (307) 777-1281

CAPITOL BUILDING, WYOMING 82002

37

ED HERSCHLER
Director

JOHN BROWN, COMMISSIONER

MISCELLANEOUS

DATE: June 10, 1982

TO: Don Davis

FROM: Collins Filler *CF*

SUBJECT: Review of the Grass Creek Drifts Environmental Impact Statement

This memorandum presents the Division of Agriculture Planning and Development's comments related to the Grass Creek Drifts Environmental Impact Statement.

The Division supports Alternative 1, which calls for the implementation of livestock grazing. This alternative deserves consideration in the SIM's management plan for the following reasons. The demand for more red meat production is projected to increase through the century. It is also probable that the livestock industry will utilize less feed grains for livestock feeding for the following reasons:

- 1) Processed meat grading changes will probably result in the utilization of less grain fedstock and meat, and
- 2) The world population increase will create more demand for grains; therefore, increasing grain prices to a point where grain feeding of cattle will decline.

Should these projections occur, the livestock industry, and the nation, will become increasingly dependent upon the nation's public and private rangeland resources.

It is apparent that the SIM does not consider the importance of the livestock industry within the context of future human food needs in this country, or the United States, or as a major food supplier for the world. The Division of Agriculture Planning and Development firmly believes that food production must be given more consideration than has been demonstrated in the SIM process to date. Though it is probably considered unthinkably by most, the probability of hunger in this nation caused by overpopulation or lack of food, if it occurs the survival of wildlife or wildlife, as well as human life, is unthinkable due to increased mortality. The Division supports wildlife management along with livestock management, but both need to be managed as wildlife and not as the extension of red meat production, which has occurred and continues to occur.

"AGRICULTURE IS the backbone of Wyoming"

Page 2
Don Davis - memorandum
June 10, 1982

It is also the Division's understanding that decisions in the management framework plan were heavily influenced by the so called Soil Remediation Inventory Report (1979). This is a system analysis approach to assessing the environment. In our opinion this system is currently incapable of objectively analyzing the thousands of environmental components that exist in any rangeland ecosystem. This program is still experimental and is not being used to develop management framework plans in other states. In our opinion this system should not be part of the planning process in the Grass Creek Resource Area.

In some 105 of the draft statements it is made that much valuation may be reduced as much as \$1 million dollars for the proposed action and Alternatives 3 and 4. Generally ranching operations in Wyoming are intrinsically dependent upon the availability of federal rangeland for the successful operation of the ranching unit. The Grass Creek Drifts Environmental Impact Statement should evaluate the financial loss per ranching unit based on the proposed action. If this was accomplished it is quite possible that a determination could be made that certain ranching units would be put out of business resulting from drastic reductions of RMA's. The Division would encourage this part by unit evaluation to determine the individual financial impact that each ranching unit will incur based on the proposed management plan.

Lastly, the Division of Agriculture Planning and Development wishes to be recorded as being concerned about the cumulative impacts of wildlife, all and gas well exploration. The amount of rangeland disturbed by these activities probably amounts to hundreds of acres within certain districts. The Division considers this a serious problem that has not received the attention it deserves.

Thank you for the opportunity to respond to the draft.

CF/ms

cc: John Doren, Commissioner of Agriculture

RESPONSE TO LETTER 37

37.1 See response to 15.19. We cannot evaluate the impacts on each rancher until we know how much livestock grazing would change in each allotment. This would not be known until after monitoring if the proposed action is adopted, nor has a forage allocation been made for all the other alternatives. Even if we knew how much forage would be available to each operator, the financial impact would depend on the characteristics of the ranch and the management ability of the operator.

37.2 We realize and are concerned with the destructive impacts these activities cause on the range. The Grass Creek Oil and Gas Leasing Environmental Assessment (1978) addressed the impacts of oil and gas production and related activities in the Grass Creek Resource Area. These activities have disturbed an estimated 2,700 acres, of which 1,200 acres will never produce vegetation again. Even though oil and gas activity also has beneficial affects such as producing water for livestock and irrigation and constructing roads to improve access to remote areas grazed by livestock, these activities may have also caused a loss of forage for livestock. These impacts will be considered for each allotment when decisions are made.

Department of Environmental Quality
Water Quality Division

1011 EAST LINCOLN

CHEYENNE WYOMING 82002

TELEPHONE 301 337 3700

MEMORANDUM

TO: Mr. Robert E. Sundin, Director, Dept. of Environmental Quality
FROM: E.J. Rowley, Soil Specialist, Water Quality Division
DATE: May 17, 1982
SUBJECT: Comments on the Grays Creek Grazing - World District - Draft EIS

General

We support the proposed action defined in the Draft EIS for the Grays Creek Resource Area as a best alternative for resource improvement while maintaining multiple use values. The placement of the major portion of the Fifteen Mile Creek drainage in Improvement (I) category grazing allotments due to the conflict between grazing and watershed values offsets the effectiveness of both the BLM's land use planning (BMP) process and the Big Horn Basin Drainage 200 Water Quality Management Plan in identifying and evaluating areas of critical concern for nonpoint source pollution. The "I" designation should prove mutually beneficial in the achievement of the cooperative agency goals through the 200 cooperative work plan.

Specific

1. Page 14 - Summary of Long Term Impacts -
In the table section, the total acreage totals for the figures probably should be listed.
2. Page 10 - BMP Recommendations, B.M. 3.1 -
Under A.3., comments that will be addressed in BMP development. It is important to note that special permits for grazing system on riparian areas is critical for.
3. Page 18 - A.3.a. - Vegetation Treatment Criteria For Sage Grouse Ranges -
It has been mentioned by BLM personnel that hand spraying is allowed within 5 feet of a live stream. Will this treatment apply here or will treatments be limited to ditches or riparian areas?

RESPONSE TO LETTER 38

38.1 See text revisions page 14.

38.2 See text revisions page 38.

38.3 From the range management standpoint, these allotments can best be maintained and improved by using them during the fall or winter. Exceptions are made to allow some spring/summer use if this change cannot be made.

38.4 See Text Revisions, page 58.

FROM:
Mr. Robert E. Sundin
Comments on Draft EIS - Grays Creek Grazing
May 17, 1982
Page 2

4. Page 19 - Criteria for Subtotal (C) Grazing Allotment Category -
The Fifteen Mile drainage ability meet these criteria, especially from the production potential standpoint, were it not for the watershed concerns.
5. Page 26 - Table 1-4
Blue prairie rippling is the singular vegetative treatment to be included in the Allotment Management Plan (AMP) that will be developed for the Fifteen Mile allotments. It is possible to establish test plots to evaluate the effectiveness of the treatment and the other vegetative treatments mentioned as water quality BMP's for range lands in less than good to excellent condition. Such test plots will probably be necessary to provide the data for BMP adoption in the 200 plan.
6. Page 31 - Environmental Protection Agency
The role of EPA is somewhat overstated here, in that by authorizing 200 grants to the Wyoming Department of Environmental Quality, EPA has delegated management agency responsibilities for nonpoint source pollution control to the state, which, within the framework of the Statewide 200 Plan, has delegated its authority to those regions accepted acreable planning and management responsibilities. The acreable planning or management agency in turn works with the respective land management agencies or conservation districts.
7. Page 31 - BMP Recommendations for All. 13, B.M. - 3.1
See a 6 month deferred grazing period for "C" allotments be justified on the basis of the critical growth period for any or all key species? This term pasture stress could be a rest rotation grazing system rather than a deferred system with no grazing prior to range readiness (shrub stand) in 3 year out of 10 year and no grazing prior to seed stage the other two years.
8. Page 30-31 - BMP Recommendations for All. 14.
The watershed improvement recommendations are unusually detailed here. It would seem that these recommendations should also be included in the Proposed Action. In addition, the action should, in the Proposed Action, require the drafting of a detailed watershed management plan.
9. Page 35 - Table 1-3, paragraph 1, line 5, 6, 7
None of the soil series included here are in hydrologic soil group D and therefore not well drained.

Memo
Mr. Robert E. Smith
Comments on Draft EIS - Grass Creek Drainage
Nov 17, 1982
Page 5

- 38.5 10. Page 61, paragraph 3, sentence 3:
is the reach and (un)usable river reach from sources presented upstream?
- 38.6 Page 61, paragraph 3, sentence 3:
How do intermittent streams provide or limit (2) the natural habitat that perennial streams provide?
- 38.7 11. Page 74, paragraph 5, line 3:
It should be stated here that the proposed water developments would increase the acreage of range suitable for cattle, rather than (3) (4) (5) (6) (7) (8) (9) (10) (11) (12) (13) (14) (15) (16) (17) (18) (19) (20) (21) (22) (23) (24) (25) (26) (27) (28) (29) (30) (31) (32) (33) (34) (35) (36) (37) (38) (39) (40) (41) (42) (43) (44) (45) (46) (47) (48) (49) (50) (51) (52) (53) (54) (55) (56) (57) (58) (59) (60) (61) (62) (63) (64) (65) (66) (67) (68) (69) (70) (71) (72) (73) (74) (75) (76) (77) (78) (79) (80) (81) (82) (83) (84) (85) (86) (87) (88) (89) (90) (91) (92) (93) (94) (95) (96) (97) (98) (99) (100) (101) (102) (103) (104) (105) (106) (107) (108) (109) (110) (111) (112) (113) (114) (115) (116) (117) (118) (119) (120) (121) (122) (123) (124) (125) (126) (127) (128) (129) (130) (131) (132) (133) (134) (135) (136) (137) (138) (139) (140) (141) (142) (143) (144) (145) (146) (147) (148) (149) (150) (151) (152) (153) (154) (155) (156) (157) (158) (159) (160) (161) (162) (163) (164) 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38.5 The fecal coliform concentrations which exceeded standard levels were enumerated by the USGS in 1977 (see text revision, page 61). These samples did not include enumeration of fecal streptococcus. Subsequent sampling by BLM during 1979 within drainages of the Grass Creek Resource Area pursued both fecal coliform and fecal streptococcus concentrations. The ratios of representative samples are presented below.

38.6 Our best estimate is that the miles of intermittent streams on public land in the GCRA exceeds the perennial type by at least 10 times.

38.7 The increase would be especially important for cattle.

38.8 The bold-face printing of the headings for Streams; Reservoirs; and Springs, Seeps and Canals and for Fish Habitat and Wildlife Habitat is reversed which makes interpretation difficult. Fish Habitat and Wildlife Habitat should be subordinate to the wetland headings. Streams and reservoirs are vastly different wetland habitats and it was thought best to separate discussions on fish habitat and wildlife habitat for each type. See text revision page 85.

38.9 Page 58 explains what the vegetative production includes. The total demand on lands within the allotment was used because it is impossible to separate the wildlife by land status.

38.10 No, if wildlife goals are set, the livestock numbers would vary in relation to the changing range conditions.

38.11 See text revision page D-20.

38.12 See text revision, Table F1.

Memo
Mr. Robert E. Smith
Comments on Draft EIS - Grass Creek Drainage
Nov 17, 1982
Page 6

15. (Cont.)

Violation of the bacteriological quality standard in Grass Creek for July 3 can only be documented by a number of 3 (4) (5) (6) (7) (8) (9) (10) (11) (12) (13) (14) (15) (16) (17) (18) (19) (20) (21) (22) (23) (24) (25) (26) (27) (28) (29) (30) (31) (32) (33) (34) (35) (36) (37) (38) (39) (40) (41) (42) (43) (44) (45) (46) (47) (48) (49) (50) (51) (52) (53) (54) (55) (56) (57) (58) (59) (60) (61) (62) (63) (64) (65) (66) (67) (68) (69) (70) (71) (72) (73) (74) (75) (76) (77) (78) (79) (80) (81) (82) (83) (84) (85) (86) (87) (88) (89) (90) (91) (92) (93) (94) (95) (96) (97) (98) (99) (100) (101) (102) (103) (104) (105) (106) (107) (108) (109) (110) (111) (112) (113) (114) (115) (116) (117) (118) (119) (120) (121) (122) (123) (124) (125) (126) (127) (128) (129) (130) (131) (132) (133) (134) (135) (136) (137) (138) (139) (140) (141) (142) (143) (144) (145) (146) (147) (148) (149) (150) (151) (152) (153) (154) (155) (156) (157) (158) (159) (160) (161) (162) (163) (164) (165) (166) (167) 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38.5 (Cont'd)

Stream Name and Location	Date Sampled	FC:FS
Willow Creek		
T.51N., R.96W. SENE, Sec. 18	6/26/79	1900:3131 = .61
21 Creek Above Cottonwood Creek		
T.44N., R.99W. NWSW Sec. 20	7/10/79	420:924 = .46
North Fork Owl Creek		
T.44N., R.98W. SWSW Sec. 35	7/19/79	548:628 = .87
South Fork Owl Creek		
T.43N., R.98W. S4SE Sec. 3	7/12/79	1025:1720 = .60
Cottonwood Creek		
T.44N., R.98W. SESW Sec. 10	6/13/79	160:1250 = .13
Enos Creek		
T.44N., R.98W. SESW Sec. 10	7/9/79	72:408 = .18



39

For separate charges

Wyoming State Highway Department

0454996, 0700540, 22062 5215

May 22, 1980

Grass Creek Grazing
Det. F. M. H.
Bureau of Land Management
State Identifier No. 88-115

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
2150 Capital Avenue
Cheyenne, WY 82002

Dear Mr. Hartman:

As outlined in the Draft Environmental Impact Statement, the only item in the proposed Brass Creek livestock management plan that is likely to affect highways is the fencing recommendations in Table 1-1, Page 12. We feel the plan is flexible enough to accommodate the safety needs of the traveling public. Thus, we do not anticipate any significant impacts.

Very truly yours,

William P. King
William P. King, P. E.
Environmental Services Engineer

WTS/28



40

ED HEFSCHLER, JR.

Wyoming Recreation Commission

604 EAST 25TH STREET

CHANG, N. S. & WYLLIE, E. C. 1993

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Mr. Dick Martens
State Planning Coordinator
2120 Capitol Avenue
Cheyenne, Wyoming 82002

444

The Benth EIS, Cross Creek Grazing Management, A-95 #82-115 was received in this office on April 16, 1962. Thank you for giving us the opportunity to review the report.

Enclosed is a memorandum from our staff historian and archaeologist who reviewed the materials. They indicate that further work must be done before cultural clearance for the project can be recommended by the Wyoming State Historic Preservation Officer (SHPO) for the purposes of applicable state and federal laws.

If you have any questions concerning this recommendation please contact the appropriate member of our staff.

Mark Jung, Chief
Resource Division and
Bureau 8820

Joe L. Wilson, Director and
State Historic Preservation Officer

NG-2, μm

eg: John Jameson, Bureau of Land Management, Portland



WYOMING RECREATION COMMISSION
STATE HISTORIC PRESERVATION OFFICE

41

REVIEW AND COMPLIANCE

Interdisciplinary Staff Comments

Archaeology - History - Natural Architecture - Recreation Planning

TO: Mark Jones, Chief
FROM: Richard A. Lahren, Historical Review & Compliance Officer (PMA)
DATE: Richard Kraybill, Anthropological Compliance Officer (PMA)
May 11, 1982 (Electric 15)
RE: Draft EIS Grass Creek Gearing Management

The DEIS contains concerning cultural resources do not conform to the procedures and stipulations established in the Blandford 1981 between the BLM, ADNR and USFWS signed in January, 1980.

Specifically, stipulation 1 of the PMA calls for a Class I or II cultural resource survey of the project area prior to the preparation of the DEIS. Stipulation 2 requires performing of the survey reports in the DEIS. Stipulation 4 requires the BLM to supply the BPP with copies of the survey reports. None of the actions were accomplished by BLM prior to preparation of the DEIS.

Without the cultural resource information within the Class I or II reports available, we are not in a reasonable assessment of the proposed grazing program's effects on cultural resources. We don't see the BLM officers in their own and professional. Until the federal agency complies to the PMA, the BPP cannot recommend cultural clearance for the Grass Creek Gearing BLM.

RESPONSE TO LETTER 41

41.1 Both Class I historic and Class I prehistoric inventories have been completed, copies of which were forwarded to your office in 1978 and 1979. These reports were listed in the DEIS as: Western Interpretive Services; Robert A. Murray: Principal Investigator. 1978. Class I Cultural Resource (Historic) Inventory, Worland District. Bureau of Land Management, Sheridan, Wyoming. Copy on file at Worland BLM Office. Anthro Research Co., Larry H. Lahren: Principal Investigator. 1979. A Class I Cultural Resource Inventory for the Worland District, Livingston, Montana; Manuscript on file at Worland BLM Office.

A sample (Class II) cultural resource inventory was completed in 1979, a copy of which was forwarded to your office. The reference for this report is: Anthro Research Inc., 1979. Summary data derived from a Class II Cultural Resource Inventory for the Grass Creek Planning Unit, Worland District, Wyoming. Larry A. Lahren, Principal Investigator, Livingston, Montana. BLM Contract Number YA-512-CT9-154. A manuscript is on file at the Worland District BLM office.

BLM does not expect cultural clearance based on this EIS. The proposed action indicates that clearances will be requested on individual projects based on further inventory.

THE STATE

OF WYOMING

42
MAY 11 1982

BY DEPARTMENT
CIVILIAN

State Engineer's Office

BARNETT BUILDING

DEPARTMENT OF WYOMING

April 30, 1982

TO: Dick Heston, State Planning Coordinator
FROM: Lewis E. Allen, Water Resources Engineer
SUBJECT: Draft EIS for the Grass Creek Gearing Management Project, BLM, Worland, Wyo.

The proposed action in the subject DEIS appears to be a "middle ground" approach with the intention of range improvement, among other things. It is a no serious problem with the water resources as a result of implementing the proposed action.

On page 81, Water Use, there is reference to 100 acre rangeland and 33 wells developed by BLM in the resource area. A heavy stock indicated that many of the stock waterlines are under State Engineer Bureau. All should be, as should any future water developments in the resource area by BLM or any other entity.

On page 81, Water, the second paragraph is a little confusing. First, no would be reduction in runoff of 1,000 acre-feet under the proposed action to distributed across the resource area. If the reduction was confined to one resource, it could be serious to some extent water table reduction. If it was distributed across all of the resource, the effects would probably be more on a single water right. Second, the last sentence refers to "downsides of flood flows for a particular resource." I wonder what, precisely, is meant by "downsides of flood flows" and what "beneficial effects" are being considered.

Planning for the Grass Creek Resource area should take into account the National and Comprehensive Projects as set out in Section 401 of the 1972 Wyoming Antidegradation Act. It is the policy of the State Engineer's Office to prepare prior to passage of S.A. 11, but these two projects, and particularly Comprehensive, compatibility with the Resource Area. Cooperation between the BLM and the State could result in mutually beneficial development.

RESPONSE TO LETTER 42

42.1 The reduction in runoff is assumed to be distributed equally across the resource area.

The statement "lower peak floods flows for a particular rainfall event" is attempting to explain that the anticipated reduction in runoff will be due to a loss of ephemeral flow derived from spring and summer rain storms as opposed to a loss of perennial and intermittent sources such as snow pack and base flow. The runoff "loss" is actually water that is kept on upland sites due to increased vegetative cover and infiltration.

The statement may become more understandable in the context of the runoff curve number procedure for estimating direct runoff, which generally predicts lower runoff volumes and lower "peak" discharges when displayed on a hydrograph on rangeland in good condition as opposed to poorer condition rangeland for the same rainfall amount (of course some storms may not produce runoff). Thus "a particular rainfall event" may be thought of as a storm return period and rainfall duration time (i.e., 2 year and 6 hours storm).

Dick Harrison
April 30, 1982
Page Two

Thank you for the opportunity to review this EIS and submit comments. Your referral recommendation is being retained as requested.

LDJ/hc

cc: George A. Christopson
State Engineer



THE STATE OF WYOMING

Game and Fish Department

CHEYENNE, WYOMING 82002

CARL W. THOMAS
DIRECTOR

June 14, 1982

EIS 576/21 GRAY CREEK CREEK
WYOMING STATE ENVIRONMENTAL
IMPACT STATEMENT

Mr. John Macdonald, Team Leader
Bureau of Land Management
Box 119
Hotland, Wyoming 82025

Dear Mr. Macdonald:

We have reviewed this EIS and found that the proposed action appears to be compatible with fish and wildlife habitat and would result in a significant improvement in fish habitat of certain practices are implemented. Information on fisheries resources in the document were insufficient to allow dissemination of whether overall fisheries impacts would be positive or negative. Specific comments on the EIS are as follows:

- 43.1 P. 56, paragraph one, implies terrestrial consideration only.
- P. 58, Riparian, points out the scarcity of riparian habitat (only 0.02% of land). Protection and improvement of this rare resource should be an important feature of any alternative selected.
- 43.2 P. 61, Streams, points out that only about 80 miles of perennial stream occur in the area, comprising only about 1% of stream habitat. This rare resource should likewise be maintained and improved under any alternative selected. The Wyoming stream identification map (copy enclosed) may be included in the EIS.
- 43.3 P. 61, Fish Habitat, in explaining. Several of the references cited are not specific to the Gray Creek area or Wyoming. While the references lend credence to general conditions and what one supposes, they do not describe the affected habitat in the Gray Creek area.
- 43.3 P. 62, Wildlife, mentions terrestrial species but omits fish. Fish habitat



43

RESPONSE TO LETTER NO. 43

43.1 See Text Revision page 56.

43.2 This section represents a general description of existing fish habitat conditions in streams on public land of the GCRA. References are included to illustrate that observed stream habitat problems and their causes have been documented in other areas of the West where similar land-use practices occur.

43.3 Little specific population data exists for fish in many of the streams so it was thought best to address habitat conditions which cause changes in the various fisheries. A fish species list which contains distribution data is referenced in the first paragraph of the fish habitat section.

Mr. John Macchione
June 18, 1982
Page 2, EIS 218/51

consideration under the wetlands heading was not adequate to substitute for action under the wildlife heading. Actual species present were not included in the EIS.

- 4.3.4 P. 85, paragraph two, indicates that herbicide concentrations will increase. Effects of proposed action were not displayed, only that present levels were not harmful.

- 4.3.5 P. 85, last paragraph, states that "fishery habitat would be maintained if such treatments were adopted." The effects of increased herbicide use and mortality of stream and riparian habitats and RWP recommendations (p. 10, 14). These treatments would be detrimental to fishery habitat. Will these treatments be used?

- 4.3.6 P. 86-88, Environmental Consequences - Wildlife, does not include fisheries except for a generalized listing (p. 87, 3-4) which is contained under "Wetlands", not under wildlife or the proposed action. Environmental consequences to fisheries should be displayed. The proposed action may represent opportunities for fish habitat improvement but this cannot be verified without discussion in the EIS.

P. 109, Recommended Mitigation and Minimization Measures, effects no additional clarification of fisheries impacts.

Additional comments may be provided upon review of this proposed project by Mr. Gene Division personnel. Please contact this office or our District Office in July if we may be of further help.

Sincerely,

James Maher
JAMES W. MAHER, DIRECTOR
WETLANDS DIVISION, OPERATIONS
WILDLIFE AND FISH DEPARTMENT

cc: Mr.

encl.

cc: Gene Division
Fish Division

43.4 Herbicide concentrations are not expected to increase to harmful levels from spraying of public lands due to restrictions on use near wetland areas. Refer to Table 3-8 for more detail.

43.5 The proposed action provides for wetland habitat management. Where grazing systems would not protect fishery or wetland habitat, fencing would take place as prescribed in the MFP recommendations.

43.6 Effects of the proposed action and alternatives on fish habitat are discussed on pages 85 and 86. Fish population will directly respond to changes in habitat as discussed. To further illustrate effects of the proposed action and alternatives on fish and their habitat, a column for trout has been added to Tables 3-9, 3-11, 3-12, 3-13, and 3-14 of the wildlife section.

44

Pharmaceutical, Kansas
June 11, 1982

Mr. John Macchione
Gene Division
Bureau of Land Management
Box 111
Meriden, Kansas 66541

Dear Mr. Macchione:

The following comments are submitted for your consideration on the final draft of the EIS for the proposed action.

The comments are directed to the wildlife consequences included in the report.

- 4.4.1 Page 12, 86-87, Paragraph 4, Project development and design, where feasible, it is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS. It is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS. It is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS.
- 4.4.2 Page 12, 86-87, Paragraph 4, Project development and design, where feasible, it is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS. It is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS. It is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS.
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- 4.4.5 Page 12, 86-87, Paragraph 4, Project development and design, where feasible, it is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS. It is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS. It is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS.
- 4.4.6 Page 12, 86-87, Paragraph 4, Project development and design, where feasible, it is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS. It is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS. It is recommended that the project be designed to avoid impacts on the riparian areas which have been identified in the EIS.

RESPONSE TO LETTER NO. 44

44.1 See Response 22.1.

44.2 See Text Revision page 15.

44.3 See Text Revision page 63.

44.4 See Text Revision page 64.

44.5 This may be an accurate statement, but we have no data to verify it.

44.6 See Response 29.6.

44.7

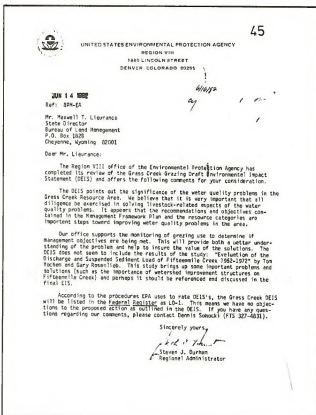
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44.9

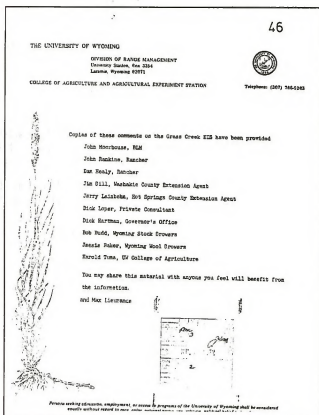
44.10

Yours truly,
Chas. J. Fenn



RESPONSE TO LETTER NO. 45

45.1 Some data from the paper referred to was in the DEIS, but was not referenced by this title. The paper is included in its entirety within the BLM URA/MFP planning documents which were referenced. Since the proposed action did not entail construction of the type of structures within Fifteen-mile drainage, it was felt that extensive discussion of sediment reduction due to structures was not warranted.



THE UNIVERSITY OF WYOMING

COLLEGE OF AGRICULTURE AND AGRICULTURAL EXPERIMENT STATION
JULY 8, 1962

Telephone: 17021 712500

Mr. John Moorhouse, Team Leader
USDI, Bureau of Land Management
Box 115
Natchez, Mississippi 39101

*Theresa E. Fisher

Men Kleinfelder and I recently had the opportunity to visit and meet with Great Green EIS come up as a topic of conversation. I told Sam that by greatest concern with the EIS was the use of the foreign alienation data. I told him that I used in Appendix Table A1 did not. Sam suggested we look at the data that was provided in the EIS. I told him that the foreign alienation data existed, everyone knew about it, and the BIA has no choice but to use it. I countered that you also have foreign condition information that that provides a check on the foreign alienation information. I told him that I had a copy of the information in our June 8th letter. I said yes, but after rereading our comment, I find that we did not elaborate on how foreign condition and travel data can be used as a check on the foreign alienation data. The purpose of this

- [illegible]

Persons seeking admission, employment, or access to programs of the University of Wyoming shall be considered equally without regard to race, color, national origin, sex, religion, political belief or handicap.

Mr. Macpherson, July 8, 1957

Page 3

all of the Goose Creek Remount Area is over grazed and rapidly deteriorating while the apparent trend data shows that 89 percent of the surveyed area is either stable or improving.

- [illegible]

46.1 The high percent of fair condition range indicates a vegetative composition made up of large amounts of plant species such as sagebrush and blue grama. It is not surprising that the apparent trend for these sites is static since this kind of range requires substantial change in use or treatment to cause change; either improvement or deterioration. This also indicates that the low amount of usable vegetation is not unreasonable since the plant species present are the less desirable ones.

A general objective for the resource area is to improve fair condition range to good condition in the next 20 years. Therefore, the fair condition may not be satisfactory unless it is improving or very near to good condition.

The apparent trend data is based on a relatively small amount of data gathered from lower elevation areas. Apparent trend observations are strongly influenced by abnormal precipitation years and amount of actual grazing use. In 1977 the lower elevation areas suffered a severe drought and then May 1978 was one of the wettest on record. Actual grazing use dropped 50 to 80 percent during the first few years after the drought. The fact that these events could have had an influence on apparent trend observations made in 1978 and 1979 makes it reluctant to place much emphasis on the use of this data.

The lower elevation ranges are predominantly saline upland range sites in the 5' to 9' precipitation zones¹. The SCS guides used to define range condition² allowed up to 50 percent by weight of Gardner saltbush to be used in establishing condition. This has since been changed by SCS to 40 percent by weight³. Much of this type was classified in good condition with large amounts of saltbrush and this vegetation type makes up 26 percent of the area.

The forage allocation process was designed to stock the area at a level that would improve the existing condition by not over-allocating desirable species. Existing stocking was based on using the vegetation present regardless of the range condition.

Mr. Northouse, July 8, 1963

Page 3

John, I'm sure that you recognize from "a", above, as the alternative recommended in the draft EIS. What I have tried to do in this letter is assist you in arriving at that recommendation in a way that you can defend. As I view the situation described by the draft EIS, what is allowed for more leverage to be used than is available, yet you have almost no idea "How"---conclude off the back again". If I see BOK, I'd like you to draft. I do not believe that this is the case and I encourage you to solve this problem before it occurs.

Sincerely,


J. L. Perry, Head
Department of Range Management
FEL/af

Bureau of Land Management
Library
Bldg. 50, Denver Federal Center
Denver, CO 80225

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